

EXHIBIT 7

INVESTIGATION REPORT

CASE: **United States v. Pirouz Sedaghaty**
CR 05-60008-HO

ATTORNEY: **Steve Wax; Larry Matazar**

INVESTIGATOR: **William Teesdale**



WITNESS: **Abdul-Quadir Abdul-Khaaliq**

DATE: **March 25, 2010**

On the above date I made telephonic contact with Mr. Abdul-Quadir Abdul Khaaliq, introduced myself as an investigator with the Federal Public Defender's office and explained our representation of Pete Seda. Mr. Abdul-Quadir agreed to speak with me. Mr. Abdul-Quadir told me that he was not personally involved in financial aspects of the Al Haramain organization, but was involved in working for Al Haramain previous to the "explosion of anti-Muslim sentiment" prior to 9/11. Mr. Abdul-Quadir said that he was involved in sending material that he cut and pasted from the Qoqaz website, which he stopped sending when there were accusations being made about that conduct, and he then wrote a "public letter" about that.

Mr. Abdul-Quadir said that the distribution of Qoqaz information was about spreading the news in a format that was a precursor to blogging. Mr. Abdul-Quadir said his job was generally sitting in front of a computer in the Kingdom of Saudi Arabia. During that period of time, Mr. Abdul-Quadir said that everyone was asking about what was going on in Chechnya. Mr. Abdul-Quadir told me that the Muslim world had a huge interest in what was happening in Chechnya and there was the issue of Russians attacking the Muslim community.

Mr. Abdul-Quadir said that there was a website that was translating news from the front lines in Chechnya and there was another site that he also reviewed. Mr. Abdul-Quadir said that he took information from the Qoqaz website and was not editing it, but then sending it out to that "forum." Mr. Abdul-Quadir said that when it became evident that some people had been prosecuted or accused of terrorism or support for Al Qaeda, because they were sending reports from the Mujahideen, he then stopped forwarding the information from Qoqaz, because he did not want to get into "hot water." Mr. Abdul-Quadir said that he is aware that there were insinuations that he personally had contact with the Mujahideen, but he did not.

Mr. Abdul-Quadir said that Pete Seda was on the Sheeshan (Arabic for Chechnya) mailing list. Mr. Abdul-Quadir said that he personally supported the Muslim cause because the Chechnyans had been unjustly attacked. Mr. Abdul-Quadir said that he saw it as an unjust ethnic cleansing and therefore wished to support his Muslim brethren. Mr. Abdul-Quadir said that at the time, they started to learn

about issues regarding Chechnya in 1994, and at that point the United States supported Chechen independence from Russia. Mr. Abdul-Quadir said that it was only later, after the incident in Beslan at the school, that the picture changed. Mr. Abdul-Quadir said that Muslims, in general, supported the Chechen cause. Mr. Abdul-Quadir said it was an important issue at the time about what was going on there in Chechnya and everyone felt that the Chechens had a right to protect themselves. Mr. Abdul-Quadir said that he believes that in 1999 the United States supported the independence of Chechnya and had the sense that the Russians had gone too far, but later the position changed.

Mr. Abdul-Quadir told me that his intent in sending Qoqaz emails was to provide information regarding what the Mujahideen were doing in Chechnya. In general, Mr. Abdul-Quadir said the news was about attacks that took place here and there. Mr. Abdul-Quadir said that initially there were reports that came to him from someone else and he would then forward them. Mr. Abdul-Quadir said that in early 2000 some of the people who ran the site out of London were accused, and the site was shut down.

Mr. Abdul-Quadir said that his role at Al Haramain was as editor of the online publication. Mr. Abdul-Quadir said that involved him reviewing English translations of literature, such as if the organization came up with a fundraiser. Mr. Abdul-Quadir said his primary responsibility was the online newsletter, although others were involved in the design of it and there were a number of different departments in the organization. Mr. Abdul-Quadir said the Al Haramain charity sought donations for all kinds of causes. Mr. Abdul-Quadir recalled there was a big push for money for widows and orphans in Chechnya. Mr. Abdul-Quadir said that the Chechnya campaign was not promoted as having anything to do with the Mujahideen, but was all about helping people suffering the ravages of war.

Mr. Abdul-Quadir said the quality of his Arabic is OK, but mostly he did English language work that involved editing translation and composition. Mr. Abdul-Quadir said that he might have looked at and/or checked translations of specific documents, but would need to look at individual documents to tell. Mr. Abdul-Quadir said that there was an English language Al Haramain website that had a newsletter. There were also other branch Al Haramain websites that were connected. Mr. Abdul-Quadir said he worked on articles that included a biography of the prophet Muhammed and also checking translations. Mr. Abdul-Quadir said that the website was at the same web address most of the time, and his recollection is that the English language site started first and then was followed by the Arabic site. Mr. Abdul-Quadir also said that there was another Al Haramain branch that had its own sites. Mr. Abdul-Quadir recalled that the Arabic and English websites were separate, but with links. Mr. Abdul-Quadir said that he did a lot of management of the English language website and much proofing and responding to emails. Mr. Abdul-Quadir said that Soliman Al Buthe was the supervisor of the English language site. Mr. Abdul-Quadir said that he does not believe that Mr. Al Buthe supervised the Arabic site.

Mr. Abdul-Quadir said, in relation to the reports of work the organization did in Albania, that those would be sent to the main office and he may well have been asked to do translation work on them. Mr. Abdul-Quadir said that he might recognize specific documents if he was shown them. Mr. Abdul-Quadir said that it's also possible that someone else would have done the translations, but he

may have checked the work.

Mr. Abdul-Quadir said that he has no doubt that the Chechnya fundraising was for humanitarian purposes, because the whole organization was involved in that work. Mr. Abdul-Quadir said that the work was about helping people in need.

Mr. Abdul-Quadir said that the accusations made against Al Haramain were very harmful to the organization, because the people there felt it was a significant blow. Mr. Abdul-Quadir said that there was a humanitarian push to go in and send truckloads of aid. Mr. Abdul-Quadir said that he saw many reports from the Al Haramain organization where they were explaining to the English-speaking world what was going on, and many reports regarding specific good work by Al Haramain. Mr. Abdul-Quadir said that he has a newsletter and we could perhaps look at previous newsletters for details.

Mr. Abdul-Quadir said that he came out to visit Al Haramain in Ashland, Oregon twice. Mr. Abdul-Quadir said that he worked quite closely with Soliman Al Buthe, who was his supervisor. Mr. Abdul-Quadir said that he was with Al Haramain until 2003 and then returned to the United States in 2007, although he did not work for Al Haramain after 2003.

Mr. Abdul-Quadir said that he remembers that the internal point of view of the Al Haramain main office in Saudi Arabia was quite outlandish about the problems being faced by the organization. Mr. Abdul-Quadir said that when it was obvious that the organization was going downhill, and he – who was a U.S. citizen – was very worried, the organization felt that the designation by the U.S. Treasury Department must have been about another Al Haramain somewhere else. Mr. Abdul-Quadir said that he was personally concerned, because of how broadly the definition of material support was being applied. Mr. Abdul-Quadir said that there was a lot of denial out there in the Al Haramain organization. Mr. Abdul-Quadir said that he remembers during that period doing a translation of a *New York Times* article for Aqueel Al Aqueel.

Mr. Abdul-Quadir said that he was aware that the Saudis seized all of the Al Haramain records, because he read that in the news reports. Mr. Abdul-Quadir said that believes that there were also legal cases in Saudi Arabia and it was a “big deal.”

Mr. Abdul-Quadir said that he never had any direct contact with the Qoqaz people and he just cut and pasted the information from the website. Mr. Abdul-Quadir said that there was also a time when the Qoqaz people had something objectionable on their site and he then sent them a letter objecting to it. Mr. Abdul-Quadir said that it was his recollection that it was something negative toward the kingdom of Saudi Arabia that they had posted.

Mr. Abdul-Quadir said that his recollection is that there was an bank account that was on the website that related to the United States office. Mr. Abdul-Quadir said that he did not talk to Pete Seda about that and he has no recollection of anything to do with the Egyptian donor.

Our telephone conversation was interrupted because Mr. Abdul-Quadir had to deal with a personal

matter, so I called him back ten minutes later and continued the conversation.

Mr. Abdul-Quadir said that he first met Pete Seda over the Internet, while Mr. Seda was having a telephone conference with Soliman Al Buthe. Mr. Abdul-Quadir recalled that the conference was about what Pete Seda was doing in Ashland and Pete sharing his ideas of what could be done. Mr. Abdul-Quadir said that the organization had a little Dawa tent and that they wanted to do presentations. The Ashland organization also sent books to prisons and dealt with correspondence.

Mr. Abdul-Quadir said that he personally hadn't met Pete Seda until he came out to Ashland to teach. When Mr. Abdul-Quadir did come out to Oregon, he found Pete Seda to be a very friendly person. Mr. Abdul-Quadir said that Pete Seda impressed him right away as a kind of person who would provide anything and would treat you like a long-lost brother. Mr. Abdul-Quadir said that Pete Seda was a very West-Coast person and quite effusive. Mr. Abdul-Quadir mentioned that Mr. Seda always had something going on and was very keen to do the work. Mr. Abdul-Quadir said that he cannot imagine that Pete Seda would do anything to jeopardize what he wanted to do.

Mr. Abdul-Quadir mentioned that another thing about of Mr. Seda was having very big ideas, one of which was the Medina project, which was to create an enclave where Muslims could live out in the West and build a city. Another idea that Mr. Abdul-Quadir recalled was when Pete wanted to go and give aid to the Palestinians. Mr. Abdul-Quadir said that this went so far as Pete going to Israel and trying to get to Palestine, but getting stopped. Mr. Abdul-Quadir said that there was also a film project, which Mr. Seda had put his own money and energy into. Mr. Abdul-Quadir said that the thing that impressed him about Pete Seda was that he put himself on the line to promote Islam and understanding between people.

Mr. Abdul-Quadir said that Pete Seda's thing was humanitarian relief and feeling for the plight of the Chechens. Mr. Abdul-Quadir said that Pete Seda was very sensitive like that and would do anything to help people in need.

As part of that, Mr. Abdul-Quadir recalled that Mr. Seda was a glass-half-full kind of person, who would look on the big side of things. Mr. Abdul-Quadir said that when he heard of Pete Seda's ideas about building an enclave for Muslims, he personally could not see how it could be done. Mr. Abdul-Quadir said that Pete Seda was not a naïve person, but rather a big-ideas man who knew how to talk to people and run his own business. Mr. Abdul-Quadir said that Pete Seda was a very optimistic person and, perhaps one could say, impractical.

Mr. Abdul-Quadir said that he recalled talking to Pete Seda about the requests he (Mr. Seda) made of the Al Haramain organization, and they discussed what Mr. Abdul-Quadir thought about the capabilities of the Al Haramain organization in Saudi Arabia. Mr. Abdul-Quadir said he remembered hearing discussions in Saudi Arabia about them liking the idea of the U.S. office, but Ashland was way out of the way of major urban centers. Mr. Abdul-Quadir said that Al Haramain KSA's capability was limited because they had to trust the person they were dealing with in the U.S., and the feeling in Saudi Arabia was that the Ashland office was accomplishing things. Mr. Abdul-Quadir said the gripe in KSA was that they chose to operate in an out-of-the-way place like Ashland. The

same criticism was also raised regarding the operation in Springfield, Missouri, Mr. Abdul-Quadir recalled.

Mr. Abdul-Quadir said that he recalled that Pete Seda was very sensitive to some of the translations of literature that the Ashland organization received from Al Haramain in Saudi Arabia and there were some that he disagreed with. Mr. Abdul-Quadir said that Pete Seda attempted to persuade Al Haramain KSA to make changes in response to those criticisms. Mr. Abdul-Quadir said that Pete Seda also wanted more support from Al Haramain KSA. Mr. Abdul-Quadir said Al Haramain KSA was very willing to hear Pete Seda's ideas, but they also wanted accountability.

Mr. Abdul-Quadir said that he remembered specifically that Pete Seda was very uncomfortable with the Mustafa Khan and Hillali (phonetic spelling) translation of the Koran, called the Noble Koran. Mr. Abdul-Quadir said that one edition of the Noble Koran had an appendix and a long treatise regarding Jihad. Mr. Abdul-Quadir said that some of those statements were tough and needed some preface, rather than just handing them out. Mr. Abdul-Quadir recalled Pete Seda pointing out to the Al Haramain organization in Saudi Arabia that it was not a good idea to send out Noble Korans with that appendix, because they were problematic.

Mr. Abdul-Quadir said that Pete Seda also worked on a well-received pamphlet, called "Islam Is." Mr. Abdul-Quadir said that Pete Seda worked for a long time on that and he also helped him with it. Mr. Abdul-Quadir said that Mr. Seda put a lot of painstaking detail into it. Mr. Abdul-Quadir said the pamphlet was Pete Seda's idea to get the message out to the average person.

Mr. Abdul-Quadir said that one of the reasons he went out to Ashland – actually the second time he went out to Ashland – was because of a concern to make sure that people were not going to extremes. Mr. Abdul-Quadir said that he is a "regular guy," so he spoke out about making sure that people were not behaving in an extreme manner to the group in Ashland. Mr. Abdul-Quadir said he believes that was in early 2001, or perhaps the summer of 2000. Mr. Abdul-Quadir said it was definitely pre-September 11, 2001. Mr. Abdul-Quadir said that there may be an audio recording of that presentation and he is sure that he has a copy of it, and perhaps it is also on the Internet.

Mr. Abdul-Quadir said that one of Pete Seda's coworkers wrote a memoir of his time in Ashland, and painted a distorted view of things. Mr. Abdul-Quadir said that the memoir by Daveed Gartenstein-Ross was untrue in places, and some things were a matter of perception. Mr. Abdul-Quadir said that he has not looked at the memoir for quite some time, but recalls that some of the things were just plain wrong, but from the way that Daveed Gartenstein-Ross told the story, there is no way that anyone outside the organization would know that. Mr. Abdul-Quadir said that the first example that springs to mind was in relation to a minor thing, when Gartenstein-Ross said that Mr. Abdul-Quadir studied in Berkeley, California, when in fact he studied at the Berklee College of Music.

Mr. Abdul-Quadir said that he does not recall having any conversations with Pete Seda about sending money to the Mujahideen. Mr. Abdul-Quadir said that he recalls that Pete Seda was solidly and adamantly against terrorism and wanted to explain to people the Muslim view of Jihad and

terrorism. Mr. Abdul-Quadir said that Pete Seda strongly denied the legitimacy of acts of terror and the killing of innocents. Mr. Abdul-Quadir said that he personally gets perturbed at having to defend the actions of others that he has nothing to do with.

Mr. Abdul-Quadir mentioned that he thinks that Pete Seda asked for an anti-terrorism Fatwah from the kingdom of Saudi Arabia. Mr. Abdul-Quadir said that he recalls translating an anti-terrorism Fatwah from a Mufti (from one of the scholars that Al Haramain would consult), that was put on the website. Mr. Abdul-Quadir said that he believes that the Fatwah was from Dr. Saleh Salan (phonetic). Mr. Abdul-Quadir said that those Fatwahs were on the Al Haramain website, saying that terrorism was unacceptable. Mr. Abdul-Quadir said that he recalls at the beginning that the Al Haramain organization was hesitant, because they were having a very hard time accepting that it could be Muslims doing such things.

Mr. Abdul-Quadir said that he remembers seeing 9/11 on television and watching those terrible images. At that time, Mr. Abdul-Quadir recalls talking to Abdul Aziz Al Shoumar, who was responsible for making sure that things were OK in the United States, and in saying that if Muslims were responsible for this, it is the stupidest thing ever.

Mr. Abdul-Quadir said that when Al Haramain made the appeal for Chechnya and set up an account for donors, it was for sheltering, feeding and clothing those who had lost homes as a result of the bombing in Grozny.

Mr. Abdul-Quadir said that Al Haramain had been involved in building schools and centers in Chechnya that had been destroyed, and a lot of work had gone into that. Mr. Abdul-Quadir said that he saw that Al Haramain was about humanitarian assistance. Mr. Abdul-Quadir said that he remembered that there were other organizations doing similar work, particularly in Bosnia, that had money unaccounted for, but Al Haramain was an honest and trustworthy organization that was about doing humanitarian aid work. Mr. Abdul-Quadir said if some of the money was used for other purposes, it was not part of what the organization wanted. Mr. Abdul-Quadir said that it was heartbreaking that the organization had to close, and the leader (Aqueel al Aqueel) probably now still does not accept it. Mr. Abdul-Quadir said that his view is that guilt-by-association is wrong; that the organization was a large one, and perhaps they could lose track of what was happening.

Mr. Abdul-Quadir said that he really was considering suing Daveed Gartenstein-Ross because of the perception that he created of Mr. Abdul-Quadir's association with Al Haramain. Mr. Abdul-Quadir said that he personally feels soured because of the labeling of people as radicals, and the lies in Gartenstein-Ross's book were so strong that it affected him personally. Mr. Abdul-Quadir said that some of the information was also published in the *Readers' Digest*, which was very upsetting. Mr. Abdul-Quadir said that he asked himself, "Who am I? Just a person who worked for a group that was accused."

I thanked Mr. Abdul-Quadir for the information and concluded the discussion.

INVESTIGATION REPORT TO FILE

Case: ***U.S. v. Seda***
CR 05-60008-HO
Attorney: **Steven T. Wax**
From: **Joe Lee, Investigator** 
Date: **April 29, 2009**
Re Witness: **George Arnold**

Reviewed with and adopted by witness on 07/06/10

As previously arranged, I contacted Mr. Arnold at his residence today. The following is a summary of our conversation.

Mr. Arnold told me that he met our client, whom he calls Pirouz, in approximately 1987. He explained that he and his family had befriended a student named Abraham Resowijayo, who attended the American Language Institute or the English Institute at Southern Oregon University in Ashland. Mr. Arnold was not entirely sure of the name of the school, but told me that it was a program under which foreign language students came to Ashland to learn English in preparation for attending college here in the United States. Mr. Arnold told me that Abraham met Pete through that program, and introduced Pete to the Arnolds.

Mr. Arnold told me that he believes it was some time later, probably 1991 or 1992, when Pete hired him as his accountant for Pete's business, The Arborist. Mr. Arnold believes that he continued as Pete's accountant from approximately 1990 - 1998. Mr. Arnold told me that he believes that it was approximately in the mid-90's when he assisted Pete in incorporating this business.

Mr. Arnold described Pete as a successful businessman. He told me that Pete is very outgoing and knows many people all over this area, and was able to tap into a large client base because of this. Mr. Arnold also told me that Pete is also very knowledgeable in the care and maintenance in trees and had a good reputation, which also helped his business.

As successful as Pete's business was, Mr. Arnold also told me that Pete was very disorganized as a record-keeper, and that he therefore really needed and relied on the services of Mr. Arnold as a CPA. Although Pete's wife, Laleh, did what she could to keep track of the records and help with the bookkeeping, Mr. Arnold told me that Pete did not use a trained bookkeeper. Mr. Arnold opined that the services of a bookkeeper would

have greatly improved Pete's record-keeping and made the accounting much easier.

Mr. Arnold told me that Pete's basic attitude was that he was the businessman, and took care of bringing in the business and generating the income, and Mr. Arnold was the accountant, and it was therefore his job to take care of the accounting and paperwork and make sure that the taxes were all properly filed and paid. Mr. Arnold told me that Pete was never looking to scam or short the government on taxes and expected Mr. Arnold to make sure that everything was done properly.

Mr. Arnold told me that Pete's bookkeeping style was essentially that he would save every receipt and bank statement, and every other business document, and then bring them to Mr. Arnold to sort out and make sense of. Mr. Arnold told me that on more than one occasion Pete did this on April 15, necessitating the filing of an extension with the IRS. "He definitely needed help. He is not a person who could keep track of the paperwork and file his own taxes. He needed an accountant and he recognized that."

Mr. Arnold told me that Pete had numerous employees working for him at The Arborist. He told me that Pete and his wife Laleh, ran the business and did the billing and hustled up more customers while others in the company that Pete had trained climbed and cared for the trees for the customers. Pete would then give to Mr. Arnold all of the receipts and paperwork, which Mr. Arnold described as "raw material," at which point Mr. Arnold would undertake the task of organizing and making sense out of it and preparing the tax return.

Mr. Arnold told me that he was aware, both through conversations with Pete and through discussions with other people in the area, that Pete was always very involved in peace activism and good works in the community of Ashland. Mr. Arnold told me that he and Pete discussed politics a few times, but also said that it was his belief that Pete's main focus was on his religion. Mr. Arnold told me that Pete was very concerned with, and very dedicated to, promoting Islam, and that Pete's interpretation of Islam was peaceful. "He told me that the Koran was subject to interpretation, and that some in the Muslim community chose to interpret parts of the Koran to be supportive of violence in the furtherance of Islam. He did not believe that to be true, and told me that the Koran is not supportive of this view."

Mr. Arnold told me that he was aware that Pete was providing copies of the Koran to prisoners throughout the United States. Mr. Arnold told me that his understanding was that someone else bought and/or provided the Korans to Pete and that Pete simply distributed them as part of his outreach and effort to promote his religion, so there was no business/tax implication for him to be concerned about.

INVESTIGATION REPORT

CASE: *United States v. Seda*
CR 05-60008 HO

ATTY: Steve Wax
Larry Matasar

INVEST: William Teesdale 

WITNESS: Rob Brown

DATE: April 4, 2009

On the above date, by prior arrangement, I met with Rob Brown at the offices of the Federal Public Defender. Mr. Brown was aware of my identity from an earlier introductory discussion with him. I provided Mr. Brown with my business card.

Mr. Brown said that he has known Pete Seda since high school, the class of 1980. Mr. Brown said he converted to Islam in 1982. Mr. Brown said that he remembered Pete Seda giving talks at the high school as a guest speaker. Mostly, Mr. Brown remembers Pete Seda discussing the Iranian hostage crises from the Iranian point of view. Mr. Brown said that he also worked together on reforestation projects with Pete Seda and worked together and lived together with him as fellow outdoorsmen. Mr. Brown said that he has also hunted with Pete Seda, although not recently. Mr. Brown said that Pete Seda became an arborist and urban forester and worked with him on that also.

Mr. Brown said that Pete Seda was always religious and started the Quran Foundation in the 1990s. The idea behind the Quran Foundation was to advance Islam peacefully by handing out free Korans, which was a big selling point for Pete.

Mr. Brown said that when Al Haramain Islamic Foundation joined forces with Pete Seda, they were very against Pete Seda's distribution of Islamic material to U.S. prisoner program. Mr. Brown said that he remembered Saudi's visiting from the head office and they were resistant to the prisoner program because they looked down on prisoners. Mr. Brown said that Daveed Gartenstein-Ross said in his book that Al Haramain Saudi Arabia used the program to recruit prisoners, but the truth was that the Saudis were not interested in Pete sending any literature to the prisoners.

Mr. Brown said that he was not paid any money for his work with the Quran Foundation or Al Haramain in Ashland but he helped out as a volunteer and acted as the English editor. Mr. Brown said that he also worked for Pete Seda at his arborist

business and was paid for that, although he was paid in cash under the table. Mr. Brown said that his work for Al Haramain ranged from five hours a week to perhaps 20 hours a week at the high point. Mr. Brown said that Pete Seda was trying to educate people about Islam and also propagate Islam. Mr. Brown said they would send out mostly Korans and pamphlets which was all self-funded by Pete Seda.

Mr. Brown said that Pete Seda is an outdoors man, an honest and religious man who always presented a very moderate view of Islam and would say that terrorists are the enemies of Islam. Mr. Brown also heard Pete Seda talk about being very anti-Taliban and also anti-mujihadeen. Mr. Brown said that he never heard Pete Seda say anything about funding the mujihadeen.

Mr. Brown said that he knows that Safiyah Balobina is Pete Seda's ex-wife, although Mr. Brown never talked to her and has no idea regarding her views because of the separation in Islam between men and women.

Mr. Brown said that over the years at Al Haramain, he would have watched many videos, although he never saw any regarding Chechnya. Mr. Brown said that he did see a documentary regarding Afghanistan about what had happened there. Mr. Brown said that although he watched videos, no one was watching any video about anything radical as far as he knew. Mr. Brown said that everyone at Al Haramain Ashland was very moderate.

Mr. Brown said that he went on Haj in approximately March 1999 and spent two weeks in Saudi Arabia. During that trip, Mr. Brown said that he did not encounter any radical discussions. He did hear presentations by Al Haramain officials. Mr. Brown recalled one in particular where someone made a presentation about birds and the wings of hope and mercy.

Mr. Brown said that he has reviewed Daveed Gartenstein-Ross's book, "My Year Inside Radical Islam." Mr. Brown said that Gartenstein-Ross has compared him to Eeyore, which Mr. Brown felt was very unfair because he was nice and kind to Mr. Gartenstein-Ross. Mr. Brown said that when he took a leave of absence from Al Haramain, Gartenstein-Ross told him, "I will never forget how you told me to be hard on yourself and easy on others." Mr. Brown said that he remembers that Gartenstein-Ross said that with a tear in his eye and that they parted as friends. Mr. Brown said that he was stunned to read Gartenstein-Ross's attack on Pete Seda in his book and Mr. Brown believes that Gartenstein-Ross "stabbed Pete Seda in the back." Mr. Brown said that Gartenstein-Ross is either misguided or opportunistic and feels that Gartenstein-Ross took the opportunity to become a big guy with the government.

Mr. Brown said that he is personally moderate in his beliefs and that he does not recall anyone saying anything extreme to him during his time at Al Haramain. Mr. Brown said that there are documented lies in Gartenstein-Ross's book and that he painted the group as fanatics. Mr. Brown said that he attended Ashland High School

and has lived in the community there and that he does not think that anyone would say that he was radical or violent. Mr. Brown said that Gartenstein-Ross made statements that he (Brown) liked the Taliban. Mr. Brown said to the contrary that he is completely anti-Taliban and everything that they stand for. Mr. Brown said that he does not think it is Islamic to repress women or to place restrictions on beard length or that kind of thing. Mr. Brown repeated that he is anti-Taliban and as far as he knows, no one at Al Haramain Ashland was a radical.

Mr. Brown said that there was a great deal of community outreach and interfaith dialogue and that the group went to other churches particularly at Thanksgiving. Mr. Brown remembered doing readings from the Koran at those gatherings.

Mr. Brown said all of the fund-raising that he was involved in was for Islamic literature. Mr. Brown said that he was not involved in any other type of fund-raising.

Mr. Brown said that he did do bookkeeping for the Al Haramain organization but never met the accountant. Mr. Brown said that he left Al Haramain in August 1999. Mr. Brown said that he worked on the computer but does not remember what bookkeeping program they used. Mr. Brown said that he used MS Word for the newsletter and that his primary function was a secretarial one. Mr. Brown said that he also was involved in giving juma talks and qutba talks. Mr. Brown said that he would research the material and then often give the sermon. He said it was not very often that Pete Seda was the one giving the presentation. Mr. Brown said that Pete Seda usually took a backseat role. Mr. Brown said it was an honor for him to present sermons and it was just like Pete Seda to push others forward and have others get credit. Mr. Brown said that they also wanted to show that the organization was a U.S. organization and not just a foreign one.

Mr. Brown said that he met Soliman Al Buthe many times and found him to be quiet and dignified. Mr. Brown said that Al Buthe did not talk much to him and never heard anything extreme from him. Mr. Brown said that Mr. Al Buthe was the facilitator for the main office in Saudi Arabia and would check what was going on in Ashland. Mr. Al Buthe was a very athletic man and interested in soccer and playing basketball. Mr. Brown said that he personally did not hear any radical positions being taken by Al Haramain, either in Ashland or even in Mecca when he was on Haj.

Mr. Brown said that when he left Al Haramain in 1999, he did leave on bad terms. Mr. Brown said that he thought Mr. Seda was getting too big for his britches and was not treating him (Brown) right. Mr. Brown said that Pete Seda was becoming dictatorial although they patched it up later. Mr. Brown said that they went through a period of not talking probably for two years. Mr. Brown said that Pete Seda is still his friend. Mr. Brown said that he does not think that Pete Seda deserves what he has gone through and that his opinion is that Mr. Seda is an outstanding citizen and that the United States should be proud of him. Mr. Brown said that Pete Seda is a kind man trying to pursue peace through understanding and the presentation of the peaceable

nature of Islam. I thanked Mr. Brown for his assistance and concluded the interview.

WT/sls

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INVESTIGATION REPORT TO FILE

Case: *U.S. v. Seda*
CR 05-60008-HO
Attorney: Steven T. Wax
From: Joe Lee, Investigator *JL*
Date: April 30, 2009
Re Witness: Marla Cates

Reviewed with and adopted by witness on August 24, 2010

As previously arranged, I contacted Ms. Cates at her residence this evening. The following is a summary of our conversation.

Ms. Cates told me that she believes that she met Pete some time in the 1990s. She told me that after my contact with her last week she had given it a lot of thought but could not, at this time, provide a more specific time frame for us. She explained that someone from a typing firm, Florins Flying Fingers, had recommended her services as a consultant in public relations to Pete and Pete had then called her.

Ms. Cates described Pete as "a very passionate and intense guy." She explained that Pete told her about his religion and his belief and practice of it as a peaceful religion, and that he was very concerned that people were seeing Islam as terrorist-based. Ms. Cates explained that Pete wanted ideas from her as to how best promote Islam as a peaceful faith.

Ms. Cates told me that Pete was very interested in putting together an educational video regarding the peaceful nature of Islam. She explained to Pete that she is not a video-person, and said that they then discussed various ideas and ways that the information might be presented to the public in a favorable light.

Ms. Cates told me that she recalls having met with Pete on four or five occasions over a two to three year period. She recalls that one of these meetings occurred at a residence on South Siskiyou Blvd. south of Ashland. She recalls that this meeting was held in an office in the residence and that there were four or five other men present at the meeting. As with her other meetings with Pete, Ms. Cates told me that this meeting with Pete and the other men concerned ways to promote the peacefulness of their faith.

Ms. Cates told me that she recalls "how very concerned he was with the situation

in Chechnya. It really, really bothered him. He told me, 'people are dying there every day,' and he wanted to help them." Ms. Cates told me that Pete asked her to help him figure out how to get government approval for him to lead a convoy of trucks full of food and medicine and clothing and blankets to help the people being harmed by this war. Ms. Cates told me that it was very clear to her that Pete's concern was sincere, and that the people he wanted to help were the refugees.

Ms. Cates told me that she believes Pete to be very intelligent and said that he is, "an idea guy." She told me that he was always coming up with new ideas and projects and discussing those with her. She told me that his concern and worry for the people in Chechnya did not strike her as being simply another project that he wanted to get involved in. She recalls him telling her that he understood the danger that would be involved in taking these supplies that they were talking about to Chechnya, and his telling her that if getting those supplies to the people that needed them meant that he had to give up his life to do it, he would be willing to do that.

INVESTIGATION REPORT TO FILE

Case: ***U.S. v. Seda***
CR 05-60008-HO
Attorney: **Steven T. Wax**
From: **Joe Lee, Investigator** 
Date: **July 20, 2010**
Re Witness: **Sharon Cummings**

I contacted Mrs. Cummings at her residence telephonically this morning. The following is a summary of our conversation.

Mrs. Cummings told me that she recalls having met and gotten to know Pete Seda when she and her former husband, Rob Brown, began worshiping with Pete and others in the small group of Muslims in this area some time in the early to mid 1990s. Mrs. Cummings told me that although she and Rob Brown have since divorced and that she is now remarried and living in Wisconsin, she remains in contact with Rob Brown and was aware of this case through him.

Regarding Pete, Mrs. Cummings told me that she would describe his personal, religious, and business views as being on the "conservative" side. She explained that what she means by that was that he was a serious student of his religion, always made time for his daily prayers, and remained focused on his faith. She told me that while Pete is, in her view, conservative, she would not describe him as being a fundamentalist. In contrast, Mrs. Cummings told me that "Raya's husband, Sheik Hassan, was more of a fundamentalist." Mrs. Cummings further described Pete as "a big thinker." She told me that as long as she has known him, he was always "driven to help people. I only ever saw the Pete that lived every day as a peaceful businessman and community leader and business leader. What you see is what you get with him. There isn't any hidden agenda, I don't think."

Mrs. Cummings told me that she has vague memories of having been on the Sisters e-mail list and receiving e-mails from various participants on the list. She explained that it would be difficult for her to comment on and/or recall specific subjects from that time without at least seeing the e-mails, and possibly not even then. She further explained that her main focus during the mid to late 90s and through the early part of the current decade was raising her children. She told me that she and Rob's children were born in 1997, 2000, and 2002.

Mrs. Cummings told me that as a group, the focus of the Sisters was to learn more about Islam. "Some of it was just us getting together, you know, bonding. But we would also get together to plan holiday activities, organizing things like the meals, or like if someone had a baby we would get together and plan for the celebration and try to figure out what the family might need that we could help provide."

Mrs. Cummings told me that she has very vague recollections regarding the Sisters being involved in fund-raising efforts to try to help the Chechyan refugees. "These were people that were really hurting. Their homes and their entire way of life had been turned upside down by that war, and this was a legitimate effort to try to help them." Mrs. Cummings told me that although she does have a vague memory of the Sisters being involved in this fund-raising effort, she does not believe that she herself really took part in that effort. She explained that she and her husband had absolutely no extra money during that time frame, and that any money they had went towards raising their children. "So I really couldn't help then, but I remember that they were raising money. I think Raya was selling some jewelry or something, and I'm not sure what other people were doing."

Mrs. Cummings told me that she remembers Safiyah as being a very nice and quiet person, "not at all outspoken." Mrs. Cummings described Raya as being "pretty conservative, a fundamentalist like her husband, Sheik Hassan." Mrs. Cummings told me that she is unaware of what fund-raising efforts and other possible support Raya and/or Safiyah may have engaged in on behalf of the Chechyan people, but also said that of the various Sisters, Raya and Safiyah spent the most time together.

Mrs. Cummings told me that she is a good typist and also has good computer skills and an administrative background. She told me that when she had the time, she would help out at the Masjid in whatever way she could. "When I had time, I helped Pete in sending materials out, just as a volunteer there." She told me that she recalls helping to mail Korans to prisoners as well as doing other small typing and/or office tasks at Al Haramain. Mrs. Cummings told me that she recalls that the Korans that they were sending to the prisoners were the Noble Koran and having been told that those were provided to Pete by the Al Haramain organization in Saudi Arabia. She told me that she did not read the appended text at the back of the Korans, and was unaware of what has been referred to as the call to jihad included in the back of the Noble Korans.

JL

INVESTIGATION REPORT TO FILE

Case: *U.S. v. Seda*
CR 05-60008-HO
Attorney: Steven T. Wax
From: Joe Lee, Investigator *JL*
Date: June 30, 2009
Re Witness: Ernest Ettlich

Reviewed with and ad opted by witness on 07/06/10

As previously arranged, I contacted Dr. Ettlich at his residence today. The following is a summary of our conversation.

Dr. Ettlich told me that he moved to Ashland and began his career at Southern Oregon University in 1978. He told me that he believes he may well have met Pete Seda, who was a student at the university at that time, during his first or second year at the college. Dr. Ettlich recalls Pete as being "a rebellious young man, like many young men" when he first became aware of Pete on campus, and also someone who Dr. Ettlich has enjoyed observing as he matured "into someone who saw a real value in community and the responsibilities of community."

Dr. Ettlich told me that during the late 1990s and early part of the following decade he taught a class at Southern Oregon University called Religion and the Human Experience. He explained that in this class, the focus was primarily on Judaism, Christianity, Hinduism, Buddhism, and Islam, and that as part of the class he shared instruction with a "community adherent" of each religion. Dr. Ettlich told me that for a couple of terms each year over a three to four year period, Pete was the "community adherent of Islam" who assisted him in teaching his class.

Dr. Ettlich told me that in teaching the class, Pete would speak to each class for approximately an hour to an hour and a half regarding his view and understanding of Islam. Of this, Dr. Ettlich stated "It was a little bit shocking to me because he was so strongly oriented to Islam as being an agent of peace, because he had been so rebellious when he was a young man. Other than among the more scholarly, this is not always the case." Dr. Ettlich explained that as with any religion, there are many followers of Islam as there are many followers of Christianity and Judaism, etc. He further explained that, generally speaking, unless one has taken the time to truly study and understand the tenants

of a particular faith, it is rather easy and human to be caught up in a superficial practice of the faith which generally begins with the premise of "my way is better than your way" and leads to less peace and more aggression.

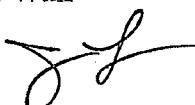
Dr. Ettlich told me that aside from his work with Pete in teaching these classes, he also had numerous private conversations with Pete, attended some of the local interfaith gatherings at which Pete spoke, and was also present as a guest at several group presentations regarding Islam which were held at Al Haramain wherein Pete spoke and presented his views of Islam as being a peaceful faith. "I did not, and have never seen, any signs that Pete was anything but absolutely sincere, and I just don't believe that I am terribly naive. One can hardly remain naive after 30 years of management in dealing with college faculty. No, Pete's gentleness and peacefulness were always consistent."

INVESTIGATION REPORT

CASE: United States v. Pirouz Sedaghaty

CR 05-60008-HO

ATTORNEY: Steven T. Wax

INVESTIGATOR: Joe Lee 

WITNESS: Mary Foster

DATE: December 16, 2008

Reviewed with and adopted by witness on 07/07/10

Investigator Debbie Hill and I contacted Abdi Guled at his residence in Ashland, Oregon. Although I had previously met Mr. Guled and we had a previously-arranged appointment for this contact, I reintroduced myself and introduced Investigator Hill to Mr. Guled, and we each provided him with a business card. Mr. Guled was very welcoming and invited us into his residence.

After directing us to chairs in his living room, Mr. Guled pulled another chair over in front of us, commenting with a smile, "This is where I will sit for my interrogation." I assured Mr. Guled that we were not here with any intention of interrogating him, but simply wished to gain his cooperation in answering some questions important in seeking the truth in this case. Mr. Guled assured us that he understood.

We then discussed with Mr. Guled the general sense of fear in the local Muslim community engendered by the fact that government agents have contacted, interviewed, and/or scrutinized virtually every member of the local Muslim community since September 11, 2001. Mr. Guled told us that he, like everyone else in the Muslim community, remains somewhat frightened to be in any way involved in this case and anxious for this all to be over. "I just told them the truth. Now I will tell you the truth. I just hope that soon the truth will be decided, and if anyone did anything wrong they can just say what that is and we can all go on with our lives."

A woman then joined us in the living room, having come from another room in the residence. Mr. Guled introduced this woman as, "My wife, Mary." I stood up to introduce myself and Investigator Hill, and Mary introduced herself to me as Mary Foster. The following is a summary of the rest of our conversation with Ms. Foster.

Ms. Foster told us that, prior to the purchase of the Al -Haramain property, at some point Pete Seda invited the group of believers she and Mr. Guled meet and pray with to meet at his residence when he lived on East Main, down the road from she and Abdi's current residence. Ms. Foster also

told us that at some point after this, Pete moved to a residence off of Culver Road, and again the group was invited to and did conduct their prayer meetings there.

As did her husband, Ms. Foster described Pete Seda as a peaceful man and denied that she ever heard him or heard of him embracing violence or Jihad or in any way championing those causes. Said Ms. Foster, "Pete has an arrogance about him, and he always has these big ideas. He has an ego, you know, he's just so full of himself. And while I can see him allowing himself to get caught up in something that he doesn't fully understand, he would never, ever involve himself in violence or terrorism in any way. I would stake my life on that. Wouldn't you agree, Abdi?" Mr. Guled agreed with this statement.

Ms. Foster told us that she believes it was in approximately 1998 or 1999 that Soliman Al-Buthe came into the picture. Ms. Foster explained that with their group always in need of a place to meet, Pete Seda was actively seeking real estate and exploring possibilities on the internet to meet that need. Ms. Foster assumes that this is how the connection between Soliman and Pete was made.

Ms. Foster told us that Pete was the primary caretaker of the Al-Haramain property and worked very hard to improve and maintain it. Ms. Foster added at this point, "And to his credit and fortunately for everyone else, I guess, Pete kept the books and all the financial dealings with al-Haramain and taking care of the property to himself. So no one else is now in trouble."

Ms. Foster told us that Al-Haramain developed into a place where local schools would have field trips and conduct special events. Pete purchased a camel and made it a pet for the enjoyment of the children and the general public. Some of the special events conducted were called "Arabian Nights" which Ms. Foster described as a cultural exchange to give people a chance to experience mid-Eastern culture. She said, "I even took my parents there; middle-class Republicans completely out of their realm. It was great."

Ms. Foster told us that at Al-Haramain there was no specific leader for the group that met and prayed. Ms. Foster also explained that at times there were visitors sent by the Al-Haramain organization who would come somewhat like missionaries to teach and to pray with the group. Ms. Foster explained that most of these visitors were more versed in the Koran and perhaps better suited to teaching them than the regular members in their core group. Ms. Foster commented that some of these visiting teachers followed "a much more strict, fundamentalist view of Islam than we do."

Ms. Foster told us that the core group consisted of approximately 25 +/- people. She described these people as being from all different backgrounds: college students, professionals, and various people from throughout the community. She also explained that at times they were joined by people who were simply traveling through the area and had possibly heard of Al-Haramain and stopped to see what it was all about.

Ms. Foster, who is now retired from her job with Jackson County ESD, told us that she was contacted by FBI Agent Dave Carroll and a female agent from the IRS at her classroom in 2004. She explained that she was told by Agent Carroll that they came to her after having read an e-mail that

had been sent to her by a woman from Yreka, California.

Ms. Foster told us that in the e-mail referred to by Agent Carrol, the woman writing to her had been talking about Chechnya and rallying support for the rebels there. Ms. Foster told us that she asked Agent Carroll and the IRS agent if they had bothered to read her response to this woman in which she told the woman that she was against all forms of war, and was uninterested in being involved in the activities the woman was writing about, and uninterested in further correspondence with the woman on these subjects.

Ms. Foster told us that she found the conversation with Agent Carroll and the IRS agent "intimidating". "I mean, the FBI is bad enough, but it's really scary to have the IRS coming after you. There was all this secrecy. He said things like, 'if you knew the things that I know,' which of course I didn't. And at one point he told me that he could take me to a website on the internet and show me a beheading. And I said, 'Why would I want to see that?' It was all just really intimidating."

Ms. Foster told us that she and Mr. Guled both experienced difficulty in traveling after 9/11. She explained that Mr. Guled had been held at an airport for 5 hours when he was on his way to Canada to play basketball at one point. Ms. Foster told us that while returning from a family wedding in Mexico, all of their belongings were searched to the extent that the authorities were even reading all of her personal diaries that she had with her.

In indicating her belief that agreeing to speak with the agents truthfully was in their best interest, Ms. Foster credits Dave Carroll with having ultimately assisted them in straightening out their travel difficulties by removing their names from any watch lists. "He did that much for us."

Ms. Foster told us that she and Mr. Guled and most, if not all, members who regularly prayed at Al-Haramain became aware at some point after 9/11 that there was a surveillance camera in the bushes by the road that recorded all of the vehicles and visitors to Al-Haramain. Ms. Foster told us that she believes it was Pete Seda's young son who first found the camera while he was playing at the bottom of the hill. Ms. Foster told us that she believes that the boy was approximately 8 - 10 years old at the time. Ms. Foster commented, "If you subpoena those surveillance tapes you'll see that everyone from the Mayor of Ashland to school officials and school groups and just everyone from the community was visiting Al-Haramain. It was a good place."

Ms. Foster was unable to provide us with a sense of exactly how long the surveillance camera might have been in place. She, like Mr. Guled, never noticed any other signs of active surveillance such as government cars or people watching Al-Haramain from a distance.

Ms. Foster told us that Pete commented on occasion that he believed he was being followed at various times. She recalled that he specifically thought that someone was following him at his mother's funeral. Ms. Foster told us that when his camel sickened and died, Pete believed that someone had poisoned it. Ms. Foster told us that it was not very long after this incident that Pete left the country.

Ms. Foster told us that she believed that when Pete left the country he was leaving on a vacation. Like Mr. Guled, her expectation was that he would be gone for three or four months and would then return. They both expressed a certain sense of betrayal in the fact that Pete did not return when he said he would.

Ms. Foster told us that after Pete left the country, no one went back to Al-Haramain for prayers. "We have a place in Phoenix now."

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INVESTIGATION REPORT TO FILE

Case: ***U.S. v. Seda***
CR 05-60008-HO

Attorney: **Steven T. Wax**
From: **Joe Lee, Investigator** 
Date: **December 16, 2008**
Re Witness: **Abdiaziz "Abdi" Guled**

Reviewed with and adopted by witness on 07/07/10

Investigator Debbie Hill and I contacted Abdi Guled at his residence in Ashland, Oregon. Although I had previously met Mr. Guled and we had a previously-arranged appointment for this contact, I reintroduced myself and introduced Investigator Hill to Mr. Guled, and we each provided him with a business card. Mr. Guled was very welcoming and invited us into his residence.

After directing us to chairs in his living room, Mr. Guled pulled another chair over in front of us, commenting with a smile, "This is where I will sit for my interrogation." I assured Mr. Guled that we were not here with any intention of interrogating him, but simply wished to gain his cooperation in answering some questions important in seeking the truth in this case. Mr. Guled assured us that he understood.

We then discussed the general sense of fear in the local Muslim community engendered by the fact that government agents have contacted, interviewed, and/or scrutinized virtually every member of the local Muslim community since September 11, 2001. Mr. Guled told us that he, like everyone else in the Muslim community, remains somewhat frightened to be in any way involved in this case and anxious for this all to be over. "I just told them the truth. Now I will tell you the truth. I just hope that soon the truth will be decided, and if anyone did anything wrong they can just say what that is and we can all go on with our lives."

A woman then joined us in the living room, having come from another room in the residence. Mr. Guled introduced this woman as, "My wife, Mary." I stood up to introduce myself and Investigator Hill, and Mary introduced herself to me as Mary Foster. The following is a summary of the rest of our conversation with Mr. Guled.

Mr. Guled told us that he came to this country in 1987 to attend college at Southern Oregon University, where he also played on the basketball team. He told us that he and a small group of Muslim students and locals began getting together for Friday prayers on a somewhat regular basis and that initially, the college allowed them to do this at Stevenson Student Union. As the group got bigger and needed more space in which to meet, Mr. Guled told us that the college provided them with a trailer on campus in which they could meet and conduct Friday prayer service.

Mr. Guled told us that this was not really an organized group and that there was no specific leader, just like-minded people getting together to worship and fellowship. He explained that there was no one involved in the group that was in charge, and that the way that it worked was more along the lines of one week a person, himself for instance, would say, "Let's talk and study about good deeds this week", and then that's what they would do.

Mr. Guled told us that he met Pete Seda in approximately 1989 or 1990. Mr. Guled explained that Pete began coming to their meetings and prayers and was very well respected and received within their group as well as within the community of Ashland.

Mr. Guled told us that as their group grew in size, it became more and more difficult to find a place where they could meet for their Friday prayers. Not being able to afford much in the way of rent, the meetings moved around from house to house for some period of time. Mr. Guled stated, "Then the war happened and things trickled down and it became even more difficult to find places to meet."

Mr. Guled told us that at some point Pete Seda invited the group to meet at his residence when he lived on East Main down the road from their current residence. Mr. Guled also told us that at some point after this, Pete moved to a residence off of Culver Road, (Wagner Creek?), and possibly on Valley View and again the group was invited to and did conduct their prayer meetings there.

Mr. Guled described Pete Seda as a peaceful man and denied that he ever heard or heard of Pete embracing violence or Jihad or in any way championing those causes. As was Ms. Foster, Mr. Guled was firm in expression of his belief that Pete is "a guy with a good heart, he's a good man."

Mr. Guled recalled that it was in approximately 1998 or 1999 that Soliman Al-Buthe came into the picture. After meeting Soliman and getting the financing Mr. Guled believes came from the Al-Haramain charity, the property locally known as Al-Haramain on the south end of Ashland was purchased and their group's prayer meetings were moved to that property.

Mr. Guled told us that when the Al-Haramain property was first purchased, Pete was still living in the residence off of Valley View. He told us that at some point, Pete sold the residence he was living in and moved from that residence and into the downstairs portion of the residence at Al-Haramain. The upstairs was used for prayers and meetings. Mr. Guled told us that Pete was the primary caretaker of the Al-Haramain property and worked very hard to improve and maintain it.

Mr. Guled told us that at Al-Haramain, as before, there was no specific leader for the group that met there for prayers and fellowship. He explained that the Al Haramain organization would from time to time send teachers to lead them. Unlike Ms. Foster, Mr. Guled took the position that while these teachers may have held more strict fundamentalist Islamic views, "I

can't really say. I didn't know them. They were here for a short time and I cannot say that I know them so I cannot say what is in their heart."

Mr. Guled told us that the core group that regularly gathered for Friday prayers consisted of approximately 25 +/- people. He explained that the members changed over the years, as people moved away, etc., but that the numbers are approximately the same.

I asked Mr. Guled to describe for me the contact and questions by the FBI. Mr. Guled said, "Listen. They are the government, and you are the government. They had questions and I answered them truthfully. And you have questions and I am answering them truthfully. I don't want to get into what they asked me or what you ask me. If you ask questions I will answer them truthfully." I did not press Mr. Guled on this point.

Mr. Guled told us that his contact with Agent Carroll and the FBI came in 2005. Mr. Guled told us that he agreed to speak with the agents because he did not want any trouble and everyone in the Muslim community was painted with a terrorist brush. They were trying to clear their name. Mr. Guled said, "You don't know where you're being hit. You don't know where the questions are coming from, and what they think they know. You just try to answer the questions truthfully and hope for the best in that situation, and that's what I did."

Mr. Guled told us that he and Mary and most, if not all members who regularly prayed at Al-Haramain became aware at some point after 9/11 that there was a surveillance camera in the bushes by the road that recorded all of the vehicles and visitors to Al-Haramain. When asked if he had ever asked a friend from the Ashland Police Department to come look at the surveillance camera, Mr. Guled replied "That never happened." He also told us that he does not know if anyone from the Ashland Police Department or any other agency ever came to look at the camera. "You should be able to find those things out by going to the police department or other agencies. You should ask them."

Mr. Guled could not provide us with a sense of exactly how long the camera might have been in place. He never noticed any other signs of active surveillance such as government cars or people watching Al-Haramain from a distance.

Mr. Guled indicated to us that after Pete left the country, no one went back to Al-Haramain for prayers. "We had to find other places." He explained that for approximately the last year or year and one-half they have been meeting in a place in Phoenix for their Friday prayers.

I explained to Mr. Guled that Investigator Hill and I are not the main investigators on this case and that we therefore are unable to answer his questions as to when this case will be over "so everyone's life can go back to normal." I told Mr. Guled that Jim Strupp and William Teesdale are the main investigators and that they may, after receiving my reports, have further questions for Mr. Guled and/or his wife. Mr. Guled was understanding and said that it would be fine for Mr. Strupp and Mr. Teesdale to contact him if necessary.

INVESTIGATION REPORT

CASE: *United States v. Seda*
CR 05-60008 HO

ATTY: Steve Wax
Larry Matasar

INVEST: William Teesdale 

WITNESS: David Hafer

DATE: April 4, 2009

On the above date, by prior arrangement, I met with David Hafer at the offices of the Federal Public Defender's office. Mr. Hafer was previously aware of our representation of Mr. Seda. I provided Mr. Hafer with my business card.

Mr. Hafer said that he is a United States citizen from Lakewood, California. Mr. Hafer told me that he currently is involved in painting residential houses as his occupation and has no criminal record.

Mr. Hafer told me that he met Pete Seda in about 1997 after he had previously met Rob Brown. Mr. Hafer, at about that time, had been working painting but because of weather issues, he had been working for a vacuum cleaning company called Tri Star Systems. While he was working for the vacuum cleaning company, he met Rob Brown and his wife, who was wearing the hijab. Mr. Hafer said that he had lots of questions of Rob Brown about his faith and Mr. Brown lent him a personal Koran that Mr. Brown had received as a gift. Mr. Hafer said that he felt that was very generous for Mr. Brown to do that. He also found that Rob Brown was an avid horseman as was Mr. Hafer.

Mr. Hafer told me that he had moved up to Oregon from California and in doing so had hiked up the Pacific Coast Trail. When Mr. Hafer reached Immigrant Lake, Mr. Hafer called his sister who had mailed supplies on ahead. Mr. Hafer said that it turned out that some of the supplies, including tent, sleeping bag and other things, had been stolen, which Mr. Hafer took as a sign that he was suppose to stay.

As a result, he met Rob Brown and later David Rodgers. Mr. Hafer said that Rodgers and Brown invited him to attend the masjid (house of prayer) on Siskiyou Blvd. Mr. Hafer said that that was the time at which they had just purchased the house but the prayers were still taking place at Mr. Seda's house, which was on Crowson Road. Mr. Hafer said that he believes he met Rob Brown in approximately September 1997.

Mr. Hafer said there was lots of work to be done and in late 1997, early 1998, he was involved in doing painting and decorating and acted as the caretaker for the masjid. Mr. Hafer said that he lived at the masjid and that it was a volunteer position. Mr. Hafer said that he always acted as a volunteer in exchange for having a place to stay and food to eat.

Mr. Hafer said that there were two separate things going on, one of which involved the Quran Foundation, which was a non-profit foundation run by Mr. Seda and there was also the Al Haramain building where Mr. Hafer acted as caretaker. Mr. Hafer recalled that within about four months, he met Soliman Al Buthe, who had come over from Saudi Arabia. Mr. Hafer said that Al Haramain and the Quran Foundation corroborated, with Al Haramain providing Islamic literature and the Quran Foundation mailing out the literature to those who requested it.

Mr. Hafer said that each piece of Islamic literature had a number and the organization kept a data base to make sure they did not duplicate sending out the same things. Mr. Hafer said the majority of people requesting literature were probably 60-65% U.S. prisoners and the others, the remaining 25-30%, were letters from all over the world. Mr. Hafer said that everything was sent out book rate. Mr. Hafer said that he calculated he was spending 200 hours a month sending out literature. Mr. Hafer said that some things that were sent out by the Koran Foundation were sent back by the prison system because they felt some things were inappropriate. Mr. Hafer told me that someone from California, he believes a chaplain in the prison system, came out to Al Haramain and reviewed everything and said that it was okay. Mr. Hafer said that to his knowledge, there were no complaints or problems until he read Mr. Gartenstein-Ross's book to do with footnotes in some of the Korans regarding jihad. Mr. Hafer said that he thinks that the criticism related to the pocket sized Nobel Koran.

Mr. Hafer said that the literature was coming from the Ashland prayer house, where there was a garage full of books that the organization received from the Kingdom of Saudi Arabia. Mr. Hafer recalled going to Chicago and taking lots of literature with him. The conference was an Islamic conference that Mr. Hafer remembers was very mainstream. Mr. Hafer said that all of the Islamic literature that he sent out, he had read prior to sending. Mr. Hafer said he was curious and thirsty for knowledge about Islam. Mr. Hafer said he was also frustrated that it was always the Nation of Islam or radicalism in the news regarding Muslims. Mr. Hafer said that there was nothing that he encountered during his work for Al Haramain that he would consider extreme positions and no one advocated any violence. Mr. Hafer also noted that in relation to the Chechnya issue, the U.S. government backed the mujahadeen fighting the Soviets.

Mr. Hafer told me that his concept of Islam is that it was and is a religion of peace. Mr. Hafer said that "jihad" means struggle and his interpretation of that struggle is that 1) if someone is exploited or wrong, Mr. Hafer's duty is to hate that person with his heart; 2) that it is his duty to speak out against that wrong and the truth should win over falsehood; and 3) to change the wrong if possible, although not by arms struggle

or resistance. Mr. Hafer repeated that the literature that they sent out was non-violent and the majority was self-help literature; for example, the "Good Muslim."

Mr. Hafer said that the people he worked with at Al Haramain were always welcoming an open dialogue about Islam. Mr. Hafer recalled having discussions with Pete Seda, Dawood Rogers, and Abdul Aziz about the Koran or Sunna and they would review the Hadith. Mr. Hafer said there was never a point where he had to accept someone's word or opinion if he disagreed with it.

Mr. Hafer told me that his parents were missionaries for the Church of Nazarene and were of the fire and brimstone type. Mr. Hafer said his parents used the bible completely out of context. Mr. Hafer said that in contrast, when he learned about Islam, the whole text was in context and all questions were answered. Mr. Hafer said at no time was anyone discussing the Koran pro-violent. Mr. Hafer said that Pete Seda was always adamant that violent people were not Muslims.

Mr. Hafer said when he first became involved with Al Haramain, Abdi Aziz was the imam, but Mr. Aziz would not fully take charge. Mr. Hafer said there were a number of people who would present the Friday sermon (qhutba). Mr. Hafer said that Pete Seda, Dawood Rogers, and David Gartenstein-Ross did also. Mr. Hafer said that they would recite Suras and talk about what was happening in Algeria, Yemen, or Palestine. Mr. Hafer said that he left Al Haramain after David Gartenstein-Ross had been there approximately six months. Mr. Hafer said that he went on Haj (pilgrimage) to Mecca, Kingdom of Saudi Arabia, in 1998 or perhaps 1999.

Mr. Hafer said that he was aware at the time that the United States State Department recognized Chechnya as an autonomous zone. Mr. Hafer remembered having discussions about the casualties on the Chechen side and there being a whole mix of information about what was going on. Mr. Hafer said that his recollection is that that was prior to the problems in Kosovo. Mr. Hafer said that he does not have any recollection of looking at the qoqaz website. Mr. Hafer said that one of his favorites was Idris Palmer's website. Mr. Hafer also said he had no recollection of the Sheeshan group.

Mr. Hafer said that they would see people from all over the world, including Afghanistan, Somali, Ethiopia, and Pete Seda never said anything about supporting the mujahadeen. Mr. Hafer recalled that they did discuss scholars opinions' from Egypt and the Kingdom of Saudi Arabia. Mr. Hafer recalled that the majority of the learned scholars did not consider Kosovans, Chechnyans, or Albanians as mujahadeen because, in their opinion, the Chechen cause was not a true mujahadeen cause because they were fighting for statehood, not for Islamic freedom.

Mr. Hafer said that he had no recall of Safiyah Radmilla Balobina. Mr. Hafer said that Pete Seda was married but that he never met Pete's wife and never spoke to his wife, although Mr. Hafer thought he might have possibly spoken to her on the

telephone. Mr. Hafer said that at the prayer house, the women had the bottom floor and the men had the top floor.

Mr. Hafer told me that he thought David Gartenstein-Ross was very full of himself, yet his knowledge was quite limited. Mr. Hafer found Gartenstein-Ross long on rhetoric but short on substance and his Islamic knowledge very basic. Mr. Hafer told me that he has read Gartenstein-Ross's book "My Year Inside Radical Islam." Mr. Hafer said that Gartenstein-Ross was there approximately 8 months and not a year and that Mr. Hafer disagrees with just about everything Gartenstein-Ross wrote in the book. Mr. Hafer said that the book was both opportunistic and disrespectful. Mr. Hafer mentioned Gartenstein-Ross referring to Sheik Adlee with a reference to "what's shaking sheiky." Mr. Hafer said that, in his opinion, Sheik Adlee was a very knowledgeable and great man and should have been shown due respect.

Mr. Hafer said that he personally saw no radicalism while he was at Al Haramain. Mr. Hafer remembered books coming in in two or three shipments through USF Reddaway. Mr. Hafer remembers Gartenstein-Ross taking over that work with the books and that he (Hafer) resented Gartenstein-Ross interjecting himself when Gartenstein-Ross would only do an 80% job. Mr. Hafer said that Gartenstein-Ross lost half of Hafer's database and Gartenstein-Ross said a lot of derogatory things that were not true. Mr. Hafer said that he cared for Gartenstein-Ross's girlfriend even less and eventually Gartenstein-Ross married her. Mr. Hafer said that the girlfriend went around with a nasty scowl on her face. Mr. Hafer said that he was never paid a salary when he worked at Al Haramain and that he was there about 2-3 years, perhaps nearly 3, and then came back for another 3 or 4 months after David Gartenstein-Ross left.

Mr. Hafer said that he always got along with Pete Seda and that he warned Mr. Seda about Gartenstein-Ross. Mr. Hafer thinks that Mr. Seda was a bit star-struck over Gartenstein-Ross because he had a degree. Mr. Hafer said that Gartenstein-Ross made it up, that the Al Haramain people were radical. Mr. Hafer does recall talking with Gartenstein-Ross about Afghanistan and discussing the fact that the leadership of the Taliban were originally mujahadeen. Mr. Hafer recalls Gartenstein-Ross arguing and saying that none of the Taliban leadership were mujahadeen and likened it to the difference between the IRA and Sinn Fein, the separate political wing.

Mr. Hafer said that he did recall watching one video that was 12 or 13 minutes long regarding Chechnya, but that the video was "cheesy." Mr. Hafer said the video showed the leader in Chechnya and a bunch of people two-stepping with some narrative. The video touted how the Chechens had defeated the Soviets. Mr. Hafer said he did not know where the video came from and that he recalled perhaps six people, including Pete Seda, David Rodgers, and Rob Brown watching the video, which was shown by Mr. Seda. Mr. Hafer said that the gist of the conversation was about how ridiculous the people two-stepping looked, and that they were wearing these big, fuzzy hats. Mr. Hafer said he recalled that the video was after the first war in Chechnya and discussed how they won. Mr. Hafer again said that the U.S. State Dept. recognized

Chechnya. Mr. Hafer also mentioned that the cheesy documentary about Chechnya also showed a victory parade. Mr. Hafer said the video was not a mujahadeen video.

Mr. Hafer also recalled watching Christian Amanpour and her CNN reports regarding Algeria. Mr. Hafer said that there was an observed election and after that a military coup supported by the French. Mr. Hafer said that they would watch many mainstream news groups about things going on that affected Muslim populations around the world, but there was no rah rah rah about jihad. Mr. Hafer said that it was discussion and information gathering about what was happening in the world.

Mr. Hafer said that the Al Haramain people also went to mosques, churches, and synagogues and took Mandoub, the camel, in order to do multi-cultural events. Mr. Hafer said that their goal was "peace through understanding" and that they would go to all kinds of other events, including Greek Orthodox and Jewish activities. Mr. Hafer said that before the Al Haramain organization came along, the Koran Foundation was a shoe string organization, so when Soliman Al Buthe came with all of the funds, it was a godsend.

Mr. Hafer said that Pete Seda and Soliman Al Buthe got on well. Mr. Hafer found Al Buthe soft spoken, but very direct and was a good person. Mr. Hafer recalls Mr. Al Buthe saying that his goal was "dua" which was talking to people.

Mr. Hafer said that the only conflict he ever witnessed was witnessed after the Saudi money came in and was over a book that discussed the difference between Shia and Islam. Mr. Hafer said that the Salafi viewpoint is that Shism is a perversion of the true faith. Mr. Hafer mentioned that the majority of Saudis are Sunni and many of them are Salaafists. Mr. Hafer mentioned that when he went on haj, he was encouraged by Soliman Al Buthe to talk to Shia Muslims that he encountered.

Mr. Hafer said that in Ashland, the number of Muslims praying together was generally 20-25 and 4-6 of them would be Sufi or Shia. Mr. Hafer said the majority were Sunni, but there was no animosity between Sunni and Shia and that Mr. Seda's brother, Bijan, is a Shia Muslim.

Mr. Hafer said that he was always told by Mr. Seda and Soliman Al Buthe to correct people very gently. Mr. Hafer said that Pete Seda was 100% adamantly non-violent and said many times to Mr. Hafer that people who commit acts of terrorism are not true Muslims.

Mr. Hafer also recalled coming across Sheik Hassan, another Sheik who was married to an Iranian woman. Sheik Hassan gave a couple of talks on Hidra (migration) at the prayer house. Mr. Hafer remembered Sheik Hassan encouraging U.S. citizens to immerse themselves in Muslim culture and then come back so they could get a truer sense of Islam.

Mr. Hafer recalled meeting Abdul Quadir Abdul Khaliq, whom he met during Haj. Abdul Quadir's wife was a Moroccan. Mr. Hafer remembered being struck by what a family man Abdul Quadir was and that he was very attentive to his wife. Mr. Hafer remembered Abdul Quadir coming to Ashland and staying there for 2 months and gave a number of talks. Mr. Hafer recorded all of the talks presented by Abdul Quadir. The talks would cover everything from diet to environment and also discussed the meaning of jihad according to the Koran. Mr. Hafer said that he recalls Joseph Seda asking Abdul Quadir that if one renounces Islam, what the penalty was. Mr. Hafer recalled that Jonah was asking because he resented the fact that his mother had renounced Islam and that Jonah said she should have her head chopped off. Mr. Hafer recalled that Abdul Quadir said that that issue was between her and her God. Mr. Hafer said that later Gartenstein-Ross wrote about this discussion and misrepresented what Abdul Quadir said during the speech.

Mr. Hafer said that Gartenstein-Ross also wrote a thesis praising the nation of Islam and that Hafer read the paper and found it lacking, that it was opinionated and lacking in substance. Mr. Hafer said that Gartenstein-Ross also misquoted him about this particular argument in his book. In relation to Chechnya, Mr. Hafer recalled that there were discussions at Al Haramain about what was happening in Chechnya, but no fund-raising by Al Haramain in Ashland or Mr. Seda for Chechnya. Mr. Hafer did recall a collection for relief in Kosovo because the Serbians were bombing Kosovans. Mr. Hafer said that he recalled money coming in for Chechens from an Egyptian doctor that Mr. Hafer believes was a Zakat donation. Mr. Hafer said that he was not directly involved in this and his recollection of this is very hazy. Mr. Hafer said that he recalls that Soliman Al Buthe forgot the check so that money was wired to Ashland and that is what Soliman later took for Chechen relief. Mr. Hafer reiterated that he does not remember the facts of this particularly well.

I thanked Mr. Hafer for his time and we concluded our discussion.

WT/sls

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INVESTIGATION REPORT TO FILE

Case: ***U.S. v. Seda***
CR 05-60008-HO
Attorney: **Steven T. Wax**
From: **Joe Lee, Investigator** 
Date: **August 12, 2009**
Re Witness: **Carol Hwoschinsky**

Reviewed with and adopted by witness on 07/07/10

I contacted Mrs. Hwoschinsky at her home in Ashland this morning. After identifying myself and the reason for my contact, Mrs. Hwoschinsky agreed to be interviewed. The following is a summary of our conversation.

Mrs. Hwoschinsky told me that she believes that she has known Pete Seda for at least the last 10 years. She describes herself as a friend and confidante of Pete's and has heard him speak publicly as well as having had private conversations with him over the years.

Mrs. Hwoschinsky told me that she has heard Pete speak publicly on occasions at the college in Ashland, at Rabbi David Zaslow's synagogue in Ashland, at interfaith meetings, and on one or two occasions at Arabian Nights educational gatherings held at Al Haramain. Mrs. Hwoschinsky told me that in all of these public settings where Pete spoke, as well as in all of her private conversations with him, Pete's message has always been consistent that the Muslim faith is a peaceful faith, and that peace through communication and understanding is always Pete's objective. Mrs. Hwoschinsky told me that she has never heard Pete say anything that could in any way be interpreted as supportive of terrorists or terrorist tactics or any kind of war. In fact she has heard Pete speak out in condemnation of terrorism, and explain that those who interpret Jihad as being a command or justification for Muslims to make war on others is a misinterpretation of the Koran.

Mrs. Hwoschinsky described her visits to Al Haramain on the evenings of the Arabian nights events as educational evenings and attempts at community outreach by Pete and other local Muslims to familiarize the public with their Muslim faith and their peaceful practices. Mrs. Hwoschinsky told me that she recalls that at least one of these events Pete introduced her to a Sheik who was visiting at Al Haramain from Saudi Arabia.

Mrs. Hwoschinsky told me that she believes that Pete Seda is a very good man who sincerely cares about other people and wants very much to help those in need. Mrs. Hwoschinsky describes Pete as being very naive in some of his world views. She recalled that he always had big plans and desires when thinking of ways to help those in need. One of those plans that she became aware of was when he was raising to fund a trip to the West Bank to provide clothing and food and medicines to refugees there. Mrs. Hwoschinsky told me that because she has been to the Middle East on numerous occasions, and is familiar with the politics and processes, "I kept advising him that he needed written permission from the Israelis, and that he should have that before he ever left the United States." Mrs. Hwoschinsky told me that Pete never did get written permission, and left here with enough money to purchase goods and hire Israeli drivers to convoy the goods into the West Bank.

Mrs. Hwoschinsky told me that after he returned to the United States after this trip, Pete told her that he had been stopped at the border in Jordan by Israeli soldiers who stripped and humiliated him and left him in the sun for several hours without water. Mrs. Hwoschinsky told me that even after this treatment, Pete expressed nothing but love for his captors in her conversations with him.

INVESTIGATION REPORT

CASE: United States v. Pirouz Sedaghaty
CR 05-60008-HO

ATTORNEY: Steve Wax and Larry Matasar

INVESTIGATOR: William Teesdale

WITNESS: Dr. Amr Jamal



DATE: August 18, 2010

On the above date, by prior arrangement, Steve Wax and I met with Dr. Amr Jamal at the Federal Public Defender's office. I provided Mr. Jamal with a summary of our representation of Mr. Seda and my business card.

Dr. Jamal agreed to speak with us about his recollection of the Al Haramain organization. Dr. Jamal said that he is a Saudi citizen, currently studying medical informatics at Oregon Health Sciences University (OHSU). Dr. Jamal told us that his regular position is as assistant professor of family medicine and is a specialist in medical informatics at King Saud University College of Medicine, Department of Family and Community Medicine in Riyadh, Kingdom of Saudi Arabia. Dr. Jamal said that he will finish his course of study in approximately four months, and then return to his regular job.

Dr. Jamal said that he attended medical school in Saudi Arabia in 1997 and during his third year in medical school he volunteered to work with the Al Haramain organization on their medical committee. Dr. Jamal said that he volunteered with Al Haramain for about three or four years and helped them specifically with a medical scientific symposium that was an annual event on the subject of reconciling medical treatment with principles of Islam and working on issues, such as helping patients being able to pray.

Dr. Jamal said that he went to work for the Al Haramain organization after doing work with another Saudi charity, called the World Assembly of Muslim Youth (WAMY). Dr. Jamal said that he found that the Al Haramain organization was a more efficient organization than WAMY in spending charitable money for good causes. Dr. Jamal said that he went to work for Al Haramain because he had a desire to do community service work and was not paid for his time. Dr. Jamal said that many of the people who worked at Al Haramain were unpaid volunteers, such as himself. Dr. Jamal said that he would not have worked at Al Haramain if he knew that any of their work involved the funding of militant activity. Dr. Jamal said that he also does not believe that the government of Saudi Arabia would allow an organization like Al Haramain to fund militant activity.

Dr. Jamal said that he knows that there was a specific Al Haramain committee working on Chechnya and heard that there was a campaign for humanitarian relief. Dr. Jamal said that he was not involved in that particular committee.

Dr. Jamal said that the scientific committee he worked on organized four conferences on Islam and medicine. Dr. Jamal recalled that he did not participate in the first conference, was involved in the second and third conferences, and the last conference was cancelled just a few days prior to it occurring, because the Al Haramain organization was shut down by the Saudi government.

Dr. Jamal said that the medical committee was involved in humanitarian relief work, both inside the Kingdom of Saudi Arabia and outside Saudi Arabia. Dr. Jamal recalled that when he started working at Al Haramain, the operation was in a small villa in Riyadh and they were doing distribution of scientific lectures and internal humanitarian relief work inside Saudi Arabia. Dr. Jamal said that there was a period when the Kingdom of Saudi Arabia stopped Islamic charities doing internal humanitarian relief work, although that started again at a later stage.

Dr. Jamal said that the medical committee would request donations from medicine factories in the Kingdom of Saudi Arabia and then send those medicines to help people in other countries, such as Bangladesh, where there was a specific campaign. Dr. Jamal said that the medicines were provided free-of-charge by Al Haramain as charitable activity. Dr. Jamal said that he has a friend in Maryland, who is also a doctor, who was directly involved in some of those campaigns. Dr. Jamal said that the head of the Al Haramain medical committee was Dr. Tarik Medivi (phonetic) and the previous head was Dr. Mohammed Rothman (phonetic).

Dr. Jamal said that although Al Haramain began in a small villa, they later moved to a large building in Riyadh. Dr. Jamal said that he thought that when he started, there were perhaps a hundred volunteers working with Al Haramain. Dr. Jamal said that he did not know Soliman al-Buthe, Aqueel al Aqueel (though he had heard of him), Mansour al Kadi or Sami al Sanad. Dr. Jamal said that there were a number of Al Haramain committees working on different issues, for instance committees working on humanitarian campaigns in Kashmir, Bosnia and Chechnya. Dr. Jamal said that he would never have volunteered for Al Haramain if they had been involved in funding fighting.

Dr. Jamal said that the Al Haramain organization provided orphanages and it sponsored orphans all over the world. Dr. Jamal said that his own mother gave money to him to provide to the Al Haramain organization to sponsor orphanages, and he would receive receipts from the organization for those donations. Dr. Jamal said that the Al Haramain organization would also send reports twice a year about the orphans and orphanages, and he recalled that many of the orphans were in Chechnya. Dr. Jamal said that he will look for reports specifically about the work in Chechnya.

Dr. Jamal looked at defense exhibits 704 and 705 and identified them as exactly the same kinds of receipts that he received from the Al Haramain organization when he donated funds from his mother. Dr. Jamal said that he would look to see whether he could find any of the receipts that he had in his possession, and forward them to me. Dr. Jamal said that the majority of the originals of receipts he has in his possession are in his home office in Saudi Arabia and he may not be able to get them in

time. Dr. Jamal said that he would see what he could do and there may also be certificates of appreciation he received from the Al Haramain organization, as well as reports regarding Al Haramain's work with orphans.

Dr. Jamal said that the stamps and numbers on the receipts look the same as the ones on the receipts he obtained from the Al Haramain organization.

Dr. Jamal said that he recalled that during this period of time that there was a governmental agency in Saudi Arabia to organize humanitarian relief work that was headed by the interior minister of Saudi Arabia, Prince Naif. Dr. Jamal said that he personally made donations to that organization and he may have receipts relating to that. Dr. Jamal said that the governmental organization sent aid, including food, tents and other material, to Chechnya.

Dr. Jamal reviewed a copy of his curriculum vitae, available on his website, and identified it as the English-language version of his resumé. Dr. Jamal mentioned that the English-language version of his C.V. no longer has Al Haramain listed on it because of his concern about how that would impact his coming to study in the U.S. He has kept the reference to Al Haramain on his Arabic C.V. Dr. Jamal said that he decided to attend OHSU because he searched for the best medical university in the specific field to study and found that OHSU was the best.

Dr. Jamal mentioned that he also has a background degree in Islamic law and after attending medical school specialized in family medicine.

Dr. Jamal reviewed a number of defense exhibits.

Defense exhibit 707 (a). Dr. Jamal said that he did not recognize this document. Dr. Jamal reviewed defense exhibit 714 (a) and said it is a telegram regarding the formation of a committee to oversee charitable work in Kosovo, including representatives from Islamic charities, including Al Haramain. Dr. Jamal said that he does not recall seeing this document before, but believes that the text of the announcement was in the newspapers at the time. Dr. Jamal said that he can look in Saudi news archives to see whether that is the case.

Dr. Jamal looked at defense exhibit 716 (a), the organizational charter of the SJRC for the aid of the people of Kosovo. Dr. Jamal said that he has not seen this before, but believes that it is genuine.

Dr. Jamal examined defense exhibits 717 (a), 718 (a), 719 (a). Dr. Jamal said that he has not seen any of those documents before.

Dr. Jamal reviewed defense exhibit 720 (a) and mentioned that he personally gave money to the SJRC to help in Kosovo and Chechnya. Dr. Jamal recalled that the money was collected at a mosque where he was the prayer leader at the time. Dr. Jamal said that the donation was for humanitarian relief.

Dr. Jamal reviewed defense exhibit 721 (a), a report from the SJRC Chechnya committee. Dr. Jamal

mentioned that the Saudi people trusted those who worked at Al Haramain, and in fact it was one of the most trusted Saudi charities, particularly because many of the people who worked there were volunteers and clearly not trying to benefit themselves. Dr. Jamal recalled that in 1999 he met the head of the endowment foundation, Saleh al Hussein (who had been the minister of finance of Saudi Arabia during King Faisal's time) and they discussed organizing educational radio programming in Chechnya. Dr. Jamal said that Saleh al Hussein is currently the head of affairs of the two holy mosques. Dr. Jamal said that the Islamic Endowment Foundation in 1999 was one of the charities working with the SJRC, just as Al Haramain was working with the SJRC.

Dr. Jamal reviewed defense exhibit 722 (a). Dr. Jamal said that he did not recognize the document, but it relates to the subcommittee within Al Haramain working on Chechnya issues, and mentions the name of Prince Turki Bin Fahed Bin Jalawi al Saud as chairman of the Chechnya subcommittee within Al Haramain. Dr. Jamal said that he does not personally know the people mentioned in the document.

Dr. Jamal reviewed defense exhibit 723 (a), a report of what was being done in Chechnya by the SJRC. Dr. Jamal mentioned that the SJRC was authorized by the government of Saudi Arabia to collect money in mosques, which they did until they were forced not to by the U.S. government.

Dr. Jamal reviewed defense exhibits 724, 725, 726, 727, 728 and 729 and said that he did not personally recognize those documents.

I served Dr. Jamal with a trial subpoena requiring his attendance at the Pete Seda trial.

Dr. Jamal contacted me on August 19, 2010 by email and provided me with an image of two Al Haramain receipts that he located on his personal computer. Dr. Jamal said that the receipts were for donations he made to assist the people of Palestine. One was for some 4000 Saudi rials and the other a donation of 15 grams of gold. A copy of the file received from Dr. Jamal is attached to this report. Dr. Jamal also sent me a link to a video report about the activities of the medical committee in Arabic. The video was shown in the third scientific conference for the committee for which Dr. Jamal was part of the organizing team.

The link to the video is located at:

<http://dl.dropbox.com/u/7474560/1ST.NEW0.MPG>

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INVESTIGATION REPORT TO FILE

Case: *U.S. v. Seda*
CR 05-60008-HO
Attorney: Steven T. Wax
From: Joe Lee, Investigator *JL*
Date: July 7, 2009
Re Witness: Mary Ann Jones

Reviewed with and adopted by witness on 07/07/10

I contacted Mrs. Jones at her residence outside of Ashland, Oregon. After introducing myself, providing her with my identification and a business card, and explaining the nature of my contact, Mrs. Jones agreed to speak with me. The following is a summary of our conversation.

Mrs. Jones told me that she believes that she and her late husband met Pete Seda some time early in the 1990s, and certainly by 1992. She could not recall specifically how that meeting took place, but believes that it was in connection with either her husband's outspoken and published views regarding Israel's treatment of the Palestinian people, or in some meeting or other of local people concerned with social justice.

Mrs. Jones described Pete as "always respectful and appreciative of others, everyone, both genders and irrespective of their world view. And he was also very interested in wanting people in the United States to better understand Islam. He understands that for different groups of people to be able to get along, a better understanding of each other is really the only foundation for that. But he always struck me as a very, very respectful person, and respectful of everyone. He's respectful of women and with people with far different views and ideas of his. And he's also very caring about anyone treated unjustly."

In further describing Mr. Seda, Mrs. Jones said, "He is a very moral person, and so I assume that he is guided by a moral belief system. I don't really know much about Islam, but I do know how important his faith is to him, and how closely he tries to follow it and how good a person he is. So from that I assume that Islam is a very moral belief system. He's just a very peaceful man and always strives for harmony. He's also very appreciative of what others do to promote peace. He really pays attention to what other people do, not just locally, and very appreciative at anyone's efforts in the promotion of peace."

Mrs. Jones told me that most of she and her husband's contact with Pete over the years have been in social settings and human rights meetings. She told me that early on in their relationship, Pete wanted to and so did a lot of pro bono work as an arborist on their property "to show his appreciation for Bob's passionate and public defense of the Palestinian people and his efforts to educate the public as to the abuses that they suffer daily."

Mrs. Jones told me that she and her late husband were twice invited by Pete and attended a feast to celebrate the end of Ramadan which was held at Al Haramain. She told me that when they arrived at Al Haramain she was led to one part of the residence "where the women and smaller children were, and Bob joined the men and older boys in another part of the house." She described this separation of the women and small children from the men and older boys as "unanticipated, but not terribly surprising." Mrs. Jones told me that in part because the atmosphere she experienced at these two celebrations were "very cordial," she assumes that this separation was and is as much a cultural custom as it is religious practice. "No one was pushing their religious beliefs or trying to convert any of the non-Muslims present to Islam, we were all just sitting around and visiting and eating. The young children were playing games and the rest of us were just chatting with each other and enjoying the food."

Mrs. Jones told me that she never heard in any setting Pete talking about supporting war or freedom fighters or violence in any form. "That's just not who he is. He believes that there's always a peaceful way to settle things." Mrs. Jones told me that she does recall that she heard at some point that Pete had gathered funds and/or materials and attempted to deliver them to refugees in Palestine. Mrs. Jones told me that she believes that what she heard was that Pete was unsuccessful in this effort and was stopped by the Israelis at the border and prevented from delivering the supplies.

INVESTIGATION REPORT TO FILE

Case: *U.S. v. Seda*
CR 05-60008-HO
Attorney: Steven T. Wax
From: Joe Lee, Investigator *JL*
Date: April 29, 2010
Re Witness: Ben Searcy

Reviewed with and adopted by witness on 08/19/10

In response to one of the cards that I left at his residence, Mr. Searcy called me and arranged to meet today at the Starbucks at the south end of Ashland. The following is a summary of our conversation.

Mr. Searcy told me that he is 28 years old. He is currently employed at Blue Genie Interactive, a web design business owned by Ferhad Erdogan. This business is located at 500 A Street in Ashland, Oregon, with the phone number of (541) 201-3888.

Mr. Searcy told me that when he first met Pete, Pete's son Joseph was four-years old. Mr. Searcy believes that he was approximately seven years old at that time. Mr. Searcy describes Pete as "somewhat abrasive" in a self-reliant, alpha-male sense of the word. Of Pete, Mr. Searcy also said, "What you see is what you get. Promoting peace through dialogue is his thing. In fact, he and David Rogers came up with a motto way back then and their motto was 'peace through understanding.' That's what Pete is all about. He's really kind of a hippie. I think that's why he moved to Ashland, and that's really what that whole Medina Project was all about. He wanted to develop a totally self-reliant Muslim community or commune, like a lot of other hippies."

Mr. Searcy noted that in the FBI 302 dated October 7, 2004, the way that Dave Carroll worded the paragraph discussing the Medina Project could lead someone to believe that Pete intended the Medina Project to be some sort of training camp for Muslims preparing for Jihad. Mr. Searcy is very clear that this was not the intent at all, and that when he discussed with Dave Carroll that "everyone would be trained to defend themselves," that is exactly what he meant. "If you're going to live out in the middle of the wilderness, and be totally self-sufficient and self-reliant, then everyone needs to know how to use guns for hunting and for self-defense if necessary."

I reviewed the aforementioned FBI 302 with Mr. Searcy. Mr. Searcy told me that this 302 concerns "the original contact" between Mr. Searcy and Dave Carroll and Colleen Anderson. Mr. Searcy told me that he has been interviewed by Dave Carroll on three or four occasions, and that, as far as he can recall, Colleen Anderson was only a participant in the initial interview.

I asked Mr. Searcy questions about various portions of the information provided in the 302 dated October 7, 2004. Regarding information provided in paragraph 3 on page 2 of that report, Mr. Searcy explained that where Dave Carroll has indicated that he described Pete Sedaghaty as the emir of the Muslims in southern Oregon, what he believes he told Dave Carroll is that, whereas Sheik Hassan Zabadi and others sent to Ashland by Al Haramain Saudi were religious leaders by virtue of their religious scholarship, Pete was the community leader of the Muslim community in southern Oregon. Regarding the last sentence in that same third paragraph on page 2, Mr. Searcy explained that the “clashing” between Pete and the various imams were all essentially alpha male disputes between Pete and these people. Mr. Searcy told me that characteristically, Iranian males “like Pete and Jonah” (and himself to some extent) all tend to be alpha males who want to lead and somewhat convinced/over-confident in the correctness of their various positions and/or opinions.

Mr. Searcy explained Sheik Hassan Zabadi is a very strict fundamentalist Muslim who is very “by the book.” “He’s like ‘this is what it says, so this is what you must do.’ Pete is more like ‘this is what it says, so this is probably what it means.’”

Mr. Searcy further described Sheik Hassan as someone with “an encyclopedic knowledge of the Koran” who has no interest in debating what the various passages in the Koran say and/or mean. Contrasting Hassan with Pete, Mr. Searcy told me that although Pete’s religious convictions are very strong, and he was always ready to share those beliefs with anyone who would listen to him, he was also always willing to listen and try to understand what other people had to say about their own belief system. This was not the case with Hassan, who Mr. Searcy said would be more inclined to tell people ‘this is what the Koran commands, and if you do not believe this or follow this you are wrong and not worth talking to or worrying about.’ “Pete is more about, come on, let’s talk and try to understand each other, and Hassan is more about this is my view and I’m right and you’re wrong.”

Mr. Searcy told me that like Pete, most of the local members of the Muslim community were basically hippies who love Allah and believe in the importance of community and trying to get along with everyone. He told me that there were, from time to time, people associated with the local Muslim community who fell more into the strict fundamentalist camp of Sheik Hassan and other religious leaders who appeared from time to time, but the strict fundamentalists were always in the minority.

Mr. Searcy told me that it is his understanding that the local group began with Pete, Rob Brown, John Dunn, and David Rogers, all of whom Mr. Searcy would describe as being essentially hippies. Mr. Searcy told me that all of the conflicts that arose between Pete and the various imams and strict fundamentalists like Phillip Rand were essentially control issues over what Pete’s vision of what the local Muslim community should be versus the fundamentalist view that anything not of Islam is to be avoided. “Like I said before, culturally, Iranian men tend to want to lead, and Pete, being the community leader of the local Muslims, tended to not get along with those who came in and tried to direct the group to bend to their fundamentalist views.”

Regarding the last paragraph on page 3 of the 302 dated October 7, 2004, Mr. Searcy told me that he does recall Pete and the local Muslim community being very concerned about what was going on in Bosnia and Chechnya, and collecting money and various items to be sent to help the refugees. Mr. Searcy told me that although he was young at the time, he recalls donating some of his "clothes and stuff" to the effort. He also recalls that Pete and the other elders in the local Muslim community were very concerned about which charities and/or groups to use in getting their donations to the refugees because of the knowledge that some of the alleged charitable groups were actually fronts for and/or supportive of terrorism. "Nobody here wanted to do anything to support terrorism and killing innocent people. It was like, this is unjust, and if we can help we need to help. Not like, this is unjust, let's go kill everybody that's doing bad things to these Muslims." Mr. Searcy expressed the opinion that one can identify with and understand the reaction to unjust treatment which has made fighters out of the people in Chechnya and support their rights to defend themselves against abusive aggression without being supportive of "terrorism".

Mr. Searcy told me that he is not sure that Pete and Jonah Sedaghaty went to Sprague River, Oregon "a lot" as is indicated on page 4 in paragraph 3. He does recall Pete and Jonah going to Sprague River and how much fun they would talk about having over there. Mr. Searcy told me that Pete and David Rogers and John Dunn were all very big on the outdoors and being in and learning about nature. He also recalls that, like many southern Oregonians, these guys enjoyed shooting firearms, as does he himself.

Mr. Searcy told me that he does recall Abdul Qaadir being a part of the local community for a few months, but he does not recall exactly when that was. He also could not recall whether or not Abdul Qaadir was here during the time that Al Haramain held the summer camp for children which is referenced in paragraph 4, page 4, of the 302.

Mr. Searcy told me that the difference between the Holy Koran and the Noble Koran is the same as the difference between the King James version of the bible and more modern translations of the King James version. He further explained that "Where the King James version says 'thou shalt not do this or that,' a more modern version might say, 'don't do that.'" And he explained that the same is true between the Holy Koran and the Noble Koran.

Regarding the call to jihad included in the Noble Korans that were supplied to the local Muslim community by Al Haramain Saudi, Mr. Searcy explained that the media-driven misunderstanding of what jihad means to a Muslim make it difficult to talk rationally about jihad in America. Mr. Searcy further explained that while Pete and most of the local Muslim community recognized and were hurt by the injustice experienced by the Chechens at the hands of the Russians and wanted very much to do what they could to help those people and support them in their struggle against those injustices, that is not the same as them being willing to either support terrorist acts or travel to and join in the armed conflict.

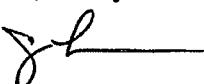
Mr. Searcy stated his view that what is presented by American news media often has very little relation to full disclosure of actual events and that it is quite common for people who aren't

satisfied with this to seek information elsewhere. Mr. Searcy told me that it is very common for Muslims to access online sources and videos for more accurate and full disclosures of what is actually occurring or has happened to their brethren and offers this as a possible explanation for some of the videos he has been told were seized by the government to be used against Pete in this case.

INVESTIGATION REPORT

CASE: **United States v. Pirouz Sedaghaty**
CR 05-60008-HO

ATTORNEY: **Steven Wax, Larry Matasar**

INVESTIGATOR: **Joe Lee** 

WITNESS: **Anita Sedaghaty**

DATE: **July 07, 2010**

Mrs. Sedaghaty met with attorney Steve Wax and I today at our office in Medford. The following is a summary of our conversation.

Mrs. Sedaghaty told us that she recalls going on the Haj with the group including the Cabrals, Rob Brown, David Hafer, and Pete and his family. She does not recall Pete asking for any money from the group or anyone in the group at the end of the trip, nor does she recall any discussions regarding Chechnya or helping Chechens at that time.

Mrs. Sedaghaty told us that she does recall Raya Shokatfard emailing the Sisters listserve regarding raising money to send to Chechnya.. She told us that Raya, like her husband Sheik Hassan, was more extreme in her views than were most of the other sisters and members of the local Muslim community, and that she found some of what Raya emailed to be offensive to her and she therefore asked Raya to not include her on any future emails concerning violence and war. She did not ask Raya to remove her from the listserv. Mrs. Sedaghaty also recalls that Safiye was “ very upset about what Russia was doing in Chechnya.”

Mrs. Sedaghaty told us that she recalls that Pete’s relations with Al Haramain Saudi were sometimes strained because, like Sheik Hassan and Raya, “some of them were a little extreme with their rules” and Pete didn’t always agree with them and their views. She was aware that Al Haramain Saudi provided Pete with the Noble Qurans and she recalls having worked a couple of hours one time packaging some of them for mailing.

INVESTIGATION REPORT

CASE: *United States v. Sedaghaty, et al.*
CR 05-60008 HO

ATTY: Steve Wax, Larry Matasar

INVEST: William Teesdale *Wendy*

WITNESS: Raya Shokatfard

DATE: September 26, 2009

On September 26, 2009, by prior arrangement, I met with Raya Shokatfard at her apartment in Cairo, Egypt. The interview was conducted in the presence of and with the permission of Ms. Shokatfard's American attorney, Tom Nelson. At the outset of the interview Mr. Nelson provided Ms. Shokatfard with a brief summary of the case and I presented her with my business card. Ms. Shokatfard agreed to speak with me.

Ms. Shokatfard told me that she was born in Iran in 1947 and moved to the United States in 1969. Ms. Shokatfard said that she lived in Southern or Northern California for over 20 years. During that time Ms. Shokatfard said that she worked in the real estate business, managing her own properties. In 1980 Ms. Shokatfard said that she married a United States citizen and later had two children, Benjamin in 1982 and Roshan in 1984.

Ms. Shokatfard said that in about 1992 her family moved to live in Castella, a town in northern California, about an hour south of Ashland, Oregon. During that time the Shokatfard family was living in the mountains and Ms. Shokatfard said that she started to practice Islam. Ms. Shokatfard remembered that she heard about a small community of Muslims in Ashland and got Pete Seda's phone number and called him. Ms. Shokatfard said that she decided to take her mother and the children and pay him a visit, which would have been in 1992. Ms. Shokatfard remembered that Mr. Seda, who was single at the time, lived in a small house in Ashland. Ms. Shokatfard recalled that Mr. Seda, who was calm and quiet, was very enthusiastic about his work as an arborist. Ms. Shokatfard said that at the beginning she did not know much about Mr. Seda but he did hold Friday prayers at this house every week and there was a group of local Muslims who gathered there. Ms. Shokatfard said that Mr. Seda mentioned that he had formed the Quran Foundation but she cannot recall now what the precise function of the Foundation was. Ms. Shokatfard said that as she got to know Mr. Seda it became clear that he was very interested in bringing an Islamic community together and he was always interested in providing all people, from whatever faith, information about Islam.

Ms. Shokatfard said that she traveled the 90 miles from Castella to Ashland

about once a month in order to visit Pete Seda and the Muslim community in Ashland. Ms. Shokatfard recalled that the Muslim community grew over time with students who attended S. Oregon University. The group would have monthly gatherings and would study together.

Ms. Shokatfard said that the group moved from the little house to a bigger house and Mr. Seda married. Ms. Shokatfard could not recall the addresses of either of these houses. Ms. Shokatfard said that Mr. Seda was getting more organized about the meetings and he was the most active member of the Muslim community in Ashland.

Ms. Shokatfard remembered when Pete Seda became involved with the Al Haramain organization. Ms. Shokatfard said that Mr. Seda was involved in the distribution of Islamic books but he never had enough Islamic literature to send out to people.

Ms. Shokatfard told me that she remembered being at the little house in Ashland with Mr. Seda when he received the first phone call requesting literature from a prisoner interested in Islam. Ms. Shokatfard said that Mr. Seda was so shocked receiving the call that he handed the phone straight to her. Ms. Shokatfard said that the person was an African in prison who wanted a copy of the Koran and that she wrote his name and address on a piece of paper and gave it to Mr. Seda. Ms. Shokatfard said that happened before Mr. Seda became involved with Al Haramain. Ms. Shokatfard said that the requests for literature began to come more and more often and Mr. Seda felt himself unable to turn any of them down. Ms. Shokatfard said that Mr. Seda would spend his own money collecting the literature and sending it out. Ms. Shokatfard said that this work was a financial and physical drain that became too much for Mr. Seda and it was taking up so much time that Mr. Seda could not get his arborist work done and it was a burden on his family. Ms. Shokatfard said: "But he has such a good heart he could not turn someone away, not just for Islam; his kindness was beyond religious belief, he would help anyone who needed help." Ms. Shokatfard said that she remembered talking to Mr. Seda about the requests for Islamic literature from prisoners and Mr. Seda would ask her why they were calling him and how even did they get his number. Ms. Shokatfard said that Mr. Seda was not all that pleased about the prisoner requests but he pushed himself to keep doing it. Ms. Shokatfard said that Mr. Seda always had a preference for talking to people face to face and he loved going to schools and universities in the local community but he did the prisoner thing because he had no choice.

Ms. Shokatfard said that Mr. Seda was very moderate in his Islamic views. Ms. Shokatfard said that at the beginning none of the group knew very much and Mr. Seda was very lenient. As a result there were some things that the group did incorrectly, such as the men and women being together to start with. Ms. Shokatfard said that over time things became a bit stricter but the push for that did not come from Mr. Seda. Ms. Shokatfard said that she remembered fighting with Mr. Seda because her views were stricter than his. For example Ms. Shokatfard said that Mr. Seda had not problem with

men and women mixing and whenever anything came up Mr. Seda always took the moderate way.

Ms. Shokatfard said that another example was that Mr. Seda always wanted to be involved in the local community. Ms Shokatfard recalled Mr. Seda saying to her that he was an American and that he wanted to be part of the community and that there should be no wall between Muslims and non- Muslims. Mr. Seda would invite non- Muslims to participate in meetings.

Ms. Shokatfard said that Mr. Seda was strongly against radicalism long before 9/11. Then when 9/11 happened Ms. Shokatfard remembered that she was in Ashland and heard Mr. Seda talking to another man (possibly Dawood Rogers) and Mr. Seda was "on fire" against 9/11. Ms. Shokatfard said that Mr. Seda was so angry that if it turned our Muslims had done it then they had ruined the name of Islam. When Ms. Shokatfard spoke to him about his she remembered that he was so upset about how wrong it was that he was cussing in front of her about those how were responsible for this, which was very unlike him.

Ms. Shokatfard told me about her recollection of a women's fundraiser to help people in Chechnya and in particular women and children who were suffering there. Ms. Shokatfard said that the local women in the Muslim community got together and raised money to try and help. Ms. Shokatfard said that the Muslim women sold jewelry, pots and pans and this and that to try and help. Ms. Shokatfard said that she also sold a cow that she had been raising for 2 years in order to help raise money and was able to raise \$680 by selling it to Mr. Seda. Ms. Shokatfard said that the Muslim women were able to raise about \$1,300 to help Chechens, which she was eventually able to send to an organization.

I asked Ms. Shokatfard to review page 2011, which I showed to her in electronic form on my laptop computer. I explained to Ms. Shokatfard that a number of pages that I might show her derived from discovery provided by the U.S. Government and that such pages were bound by a specific protective order and that I could show them to her but not provide her with a copy. Ms. Shokatfard reviewed the document and said that she did not recall the specific amount in the email but she said that in the beginning the Muslim sisters intended that the money they collected would go to the mujahadeen. Ms. Shokatfard said at that time there was no terrorist issue and the Russians had invaded and attacked Chechens because they were Muslim. Ms. Shokatfard said that the Russians were raping Chechen women and people were being slaughtered and her view was that anyone with dignity would want to help them. Ms. Shokatfard said that she also considered all of the Chechen people as mujahadeen and had no problem with them fighting against the Russians. Ms. Shokatfard said that her view was that the Chechens had the right to defend their country against the invaders.

Ms. Shokatfard said that she had no recall of the Omega foundation mentioned in the email.

Ms. Shokatfard told me that when Mr. Seda learned of the plan to send money to the mujahadeen he was adamantly against it. Ms. Shokatfard said that the collection of funds was done by the Muslim women and this was done completely separately from the men in the community.

Ms. Shokatfard said that her recollection is that she (Shokatfard) was the one who kept the money that had been collected, although it is possible that Laleh Zahedi had it for a time. Ms. Shokatfard said that she does not recall giving the money to Laleh or getting it back from her and repeated that she believes that she (Shokatfard) held the money throughout the fundraising. Ms. Shokatfard said that she is sure that Mr. Seda never had the money.

Ms. Shokatfard reviewed the email at page 000534, an email dated April 4, 2000 from Pete Seda responding negatively to Ms. Shokatfard's request to send money to the Mujahadeen. Ms. Shokatfard said that she does not recall this specific email but the content was completely consistent with Mr. Seda's view and the email address on response from Mr. Seda is definitely hers. Ms. Shokatfard said that she did not communicate with Mr. Seda in person about the fundraiser because of the separation of men and women in the Muslim community (which by this time the group was adhering to). Ms. Shokatfard explained that she knew about Mr. Seda's view because she was told by Laleh Zahedi that Mr. Seda did not support the fundraiser. Ms. Shokatfard said that she heard that more than once from Laleh and she believes more than twice. Ms. Shokatfard said that through Laleh there was a clear communication from Mr. Seda that Al Haramain would not accept money for the Chechen mujahadeen. Ms. Shokatfard said that her recollection of this is clear because she remembered being upset that Mr. Seda would not help with the donation effort.

Ms. Shokatfard said that Mary Foster, Bobby Cabral, Anita Sedaghaty, Safiyah Radmilla Balobina and Sharon Cummings were involved in the Sisters fundraiser, along with other Muslim women in the community that she could not remember.

Ms. Shokatfard said that during the first meeting the sisters were able to raise about \$160 and then during another meeting they sold clothes to raise money. Ms. Shokatfard said that she does not believe that Laleh Zahedi contributed to the fundraiser.

I showed Ms. Shokatfard page 049083, a two-page email from her dated 10/24/00. Ms. Shokatfard reviewed the email and said that she had been shown the email previously by the FBI and that she recognized it as her email indicating that the fund had been sent. Ms. Shokatfard said that \$1763 was the final amount of money that was sent but she cannot recall which organization that the money was sent to. Ms. Shokatfard said that the email would have been sent to the sisters involved in the fundraising effort and that Mr. Seda was not included in the email because he was not a part of it. Ms. Shokatfard said that the fundraising effort was for Chechens and it did not matter if it went to civilians or for mujahadeen.

Ms. Shokatfard said that she was aware that Safiyah (Safiyah Radmilla Balobina) did some translations of articles that they read on the Quoqaz website. Ms. Shokatfard said that during that period of time she was coming to Ashland quite regularly, perhaps two or three times a week. During those visits Ms. Shokatfard said that she would read with Safiyah about people being raped and killed in Chechnya by Russians. During that time Ms. Shokatfard said that Safiyah was doing translations of some of the Quoqaz articles into Russian for a website. Ms. Shokatfard said that she did not know who had asked her to do that work. Ms. Shokatfard said that she thought that Safiyah did that 3 or 4 translations and no more. Ms. Shokatfard said that during one visit to Ashland Safiyah told her that she could not do the translation work anymore because Mr. Seda had told her she could not do it. Ms. Shokatfard said that she is not certain but she thinks that Mr. Seda took the computer away from Safiyah so she could no longer do the translation work.

Ms. Shokatfard said that she told the FBI when she was interviewed that she sent the money by cashiers check or by Postal Money Order (PMO). Ms. Shokatfard told the agents that they would be able to get the information from her bank. Ms. Shokatfard said that she met the FBI agents in California and voluntarily provided agents her laptop to copy. Ms. Shokatfard said that she was questioned three times by FBI agents. On one occasion special agent Dave Carroll came with a female agent from Sacramento ask Ms. Shokatfard about why she was planning to go to Egypt. The second interview was with Special Agent David Carroll and Colleen Anderson to ask Ms. Shokatfard about the emails regarding Chechnya. The third meeting was to pick up the laptop computer. Ms. Shokatfard said that she has heard nothing since then.

Ms. Shokatfard said that her understanding was that the agreement with the Al Haramain organization was that they would send Mr. Seda Islamic books that he could distribute and that they would also provide funds to buy a center for Muslims.

I thanked Ms. Shokatfard for meeting with me and served her with a trial subpoena and provided her a letter regarding her obligations.

WT/sls

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INVESTIGATION REPORT

CASE: *United States v. Pirouz Sedaghaty, et al.*
CR 05-60008 HO

ATTY: Steve Wax, Larry Matasar

INVEST: William Teesdale

WITNESS: Magdi Zaky *WZ*

DATE: August 14, 2008

Reviewed with and adopted by witness on 07/07/10

On the above date, I received a return telephone call from Mr. Zaky, who was returning a telephone message I had left for him on the previous day. I introduced myself to Mr. Zaky as an investigator with the Federal Public Defender's Office and explained the nature of our representation of Mr. Seda.

Mr. Zaky told me that he works as a heating and air conditioning engineer in Medford. Mr. Zaky explained that he is a U.S. citizen who was born in Egypt and is a Muslim. Mr. Zaky told me that he lived in California for about 8 years and left for Oregon in 1992. Mr. Zaky said that he heard from a fellow Egyptian about a place for him to pray in Ashland in about 1995. From that time, Mr. Zaky said that he started attending Friday prayers at the mosque in Ashland that was being run by Mr. Seda. Mr. Zaky told me that he got to know Mr. Seda through attending those Friday prayers on a regular basis from approximately 1995 until the prayer housed closed. Mr. Zaky said that he would normally come for the Friday prayers and leave more or less as soon as they had finished, which would be about 45 minutes in total. Mr. Zaky explained that he attended the Mosque quite regularly, although would miss from time to time if he had to be on the road with his job. Mr. Zaky said that he tried to attend as frequently as he could.

Mr. Zaky told me that the process of Friday prayers was to perform ablution and washing after arrival and then pray to Mecca. After that would be the address or huda. After that the people would generally leave. Mr. Zaky said that he may have seen Mr. Seda give the sermon once or twice, but normally there were other people who gave the address. Mr. Zaky remembered an African American and also a different person, a Muslim from one of the western states. Mr. Zaky said that the person giving the sermon changed around from time to time.

Mr. Zaky told me that he never remembered anyone who gave any sermon at

the prayer house ever saying anything about fighting, supporting terrorism or anything else extreme. Mr. Zaky said that he does remember there being a discussion after Ramadan (when Muslims are required to give to charity) about needing to help refugees who had to leave their homes because of fighting. Mr. Zaky said that his impression of the Ashland prayer house was that it was a place of worship where moderate views were expressed. Mr. Zaky said that he does not think that the prayer house was at all extreme and that if it had been, he would not have agreed to be involved in it. Mr. Zaky said that his impression is that the prayer house was a good place to go for him to follow his faith.

Mr. Zaky told me that he did not know Mr. Seda very well socially. Of course, Mr. Zaky did see Mr. Seda at the Mosque and did say hello to him but it was a casual thing.

Mr. Zaky told me that he does not know anything about Mr. Seda's case except what he has read about in the papers. Mr. Zaky explained that he has read that Mr. Seda was in the Middle East and came back to fight his case.

Mr. Zaky recalls that Mr. Seda had a very good relationship with a local rabbi in Ashland. Mr. Zaky said that he remembers that Mr. Seda was involved in religious outreach between people of different faiths. Mr. Zaky said that Mr. Seda had a tent in Ashland and a camel and would invite other religious groups to attend. Mr. Zaky said he did not go to any of those gatherings himself but did see the tent and said that Mr. Seda presented the tent at the fair and called it the "Arabian Nights." Mr. Zaky said that Mr. Seda was well known in the Ashland community and very involved in community events. Mr. Zaky said he has not been contacted officially before about Mr. Seda. Mr. Zaky said that he is willing to come to trial and testify but hopes this will not be very disruptive.

WT/sls

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